

**WASTE MANAGEMENT PLAN**

**MIDWAY RISING PROJECT**

*Prepared for:*

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## 1. Introduction

The purpose of this Waste Management Plan (WMP) for the *Midway Rising Project* in the City of San Diego is to provide analysis of the solid waste impacts anticipated for the development and how those impacts will be mitigated. In addition, this WMP is meant to identify measures to manage waste generation and avoid potentially significant impacts. These measures will be consistent with AB 939, AB 341, and the City of San Diego's current waste reduction goals and regulations.

This WMP addresses all aspects of the implementation of Site Development: Demolition, Building Construction, and the Occupancy Phase (post-construction). For all these phases, 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. It should also be noted that, due to the lengthy phasing of the project, disposal methods and sites, as well as recycling opportunities, will likely change. Therefore, this WMP includes general information known at the time the WMP was prepared. Waste disposal sites and recycling methods and opportunities may change from those available today.

## 2. Background & Legislation

### 2.1. State Regulations (AB 939 & AB341, AB 1826, SB 1383)

In 1989, the California Legislature passed Senate Mandate 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 has diverted more than 50 percent of its generated waste stream from disposal. Assembly Bill 341 was chaptered in 2011 and sets the new diversion target at 75 percent.

In 2014, the California Legislature passed Senate mandate AB 1826 which requires business to recycle their organic waste on and after April 1, 2016, depending on the amount of waste generated on a weekly basis. Additionally, after January 1, 2016, all local jurisdictions are required to implement an organic waste recycling program to divert organic waste generated by businesses, including multifamily residential dwellings of five or more units. Minimum thresholds for organic waste generation by businesses were adjusted with the initial minimum requirement of 8 cubic yards or more of organic waste per week initiated in 2016 was reduced to 4 cubic yards or more in 2019. AB 1826 is intended to achieve California's recycling and greenhouse gas emissions reductions goals by reducing the amount of organic materials sent to landfills and increasing the production of compost and mulch, as described in the AB 32 Scoping Plan.

In 2016, the California Senate passed Senate Bill 1383 requiring a 50% reduction in disposal of organic waste from the 2014 level by 2020, and a 75% reduction by 2025. CalRecycle was granted regulatory authority required to achieve the organic waste disposal reduction targets. The bill establishes an additional target that not less than 20% of currently disposed edible food be recovered for human consumption by 2025. Effective January 1, 2022, SB 1383 requires all generators statewide to reduce organic waste that is disposed of in landfills. All residential and commercial businesses are now required to separate their organic waste for organic waste recycling. Organic waste recycling is the recycling of organic material – food scraps, food-soiled paper, and yard waste.

## 2.2. Local Policy & Regulation

Per the December 2020, *California Environmental Quality Act Significance Thresholds*, the City of San Diego has established a threshold of 40,000 square feet of development as generating sufficient waste (60 tons) to have a potentially cumulative significant impact on solid waste services. According to the City's thresholds as defined in the document, projects that are 1,000,000 square feet or more generate sufficient waste (1,500 tons) have potentially significant direct impacts on solid waste services and facilities. The *Midway Rising Project*, as proposed, exceeds these thresholds, and requires the development of a WMP.

Additional local regulation pertaining to solid waste management includes the City of San Diego's Municipal Code Ch.14 Art.2 Div.8: §142.0810, §142.0820, Ch.6 Art.6 Div.7; §66.0706, §66.0709, §66.071; and Ch.6 Art6. Div6; §66.0711, §66.0604, §66.0606. 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 with more specific details on select sections shared below:

The San Diego Municipal Code §142.08 provides Refuse and Recyclable Materials Storage Regulations. The ordinance requires the diversion of recyclable materials from landfill disposal to conserve the capacity and extend the useful life of landfills in San Diego County and reduce greenhouse gas emissions. Section 142.08 provides for permanent, adequate, and convenient space for the storage and collection of refuse and recyclable material to encourage recycling of solid waste.

The City Recycling Ordinance is found in Municipal Code §66.0701 et seq. It requires the provision of recycling service for all residential uses and for commercial facilities with service for 4 cubic yards or more. In addition, the ordinance also 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.

The San Diego Municipal Code §66.0601 provides the Construction and Demolition (C&D) Debris Diversion Deposit regulations. It requires that most construction, demolition, and remodeling projects requiring building, combination, and demolition permits pay a refundable C&D Debris Recycling Deposit and divert at least 50% of their debris by recycling, reusing or donating usable materials. The ordinance is designed to keep C&D materials out of local landfills and ensure they get recycled. This ordinance requires that applicants post a deposit. The deposit is not returned until the applicants demonstrate that the material generated has been recycled or diverted from disposal in landfills.

## 3. Project Description

The *Midway Rising Project* envisions the transformation of city-owned property from a single-purpose arena, ancillary auto-oriented retail, and surface parking into a mixed-use community with up to 4,254 homes, approximately 14 acres of open space, a multi-purpose Entertainment Center, and pedestrian-oriented retail and supporting uses that together will result in an attractive, walkable, and inclusive urban village.

The project includes a 380,550 square foot entertainment venue that will be constructed at 3500 Sports Arena Boulevard San Diego, California 92110. The project site currently comprises of the existing San Diego sports arena, existing commercial uses, and parking areas.

The *Midway Rising Project* is in the Midway-Pacific Highway community of San Diego, California. The plan area is immediately south of Interstate 8, west of Interstate 5, near Mission Bay, Old Town, Point Loma, and less than two miles from the San Diego International Airport. Prominent surrounding attractions include Sea World, Old Town, Liberty Station, and Mission Bay.

Located in the northernmost section of the Midway-Pacific Highway community, the site encompasses approximately 49.23 acres of developed land generally bounded by Kurtz St. to the north, Sports Arena Blvd. to the south, Hancock St. to the north and west, and commercial properties to the east, approximately aligned to the east of Greenwood St. The project area includes the city-owned Sports Arena site (APN 441-590-04).

Adjoining uses include a commercial center directly to the west of the site, light industrial and business park uses in an area called Sports Arena Village directly north of that center, warehouse and office space along Kurtz St., and a parking structure and the Rosecrans Plaza Shopping Center directly to the east of the site. Interstate 8 runs directly to the north of the site, along Hancock St., and separates the site from the San Diego River channel and levy and Mission Bay. Key surrounding land uses include auto-oriented commercial uses (including the Sports Arena Shopping Center directly across the site along Sports Arena Blvd.), light industrial and business park uses, warehouses, and multi-family residential uses to the west of the site. In addition to the arena, a gas station, car wash, offices, a music venue, lumber store, thrift store, outlet store, two restaurants, and surface parking lots are located on site. The site is largely impermeable surfaces with scattered trees.

The *Midway Rising Project* will revitalize the Midway area and create a vibrant and inclusive community with affordable housing, quality jobs, neighborhood parks, dining, and an entertainment district for San Diego. The *Midway Rising Project* will be an inclusive community with 2,000 rent-restricted affordable homes. Through redevelopment of the site, *Midway Rising* will build a place, a destination that offers a mix of uses, active retail experiences, a range of housing choices and a vibrant public realm. Continuous open space draws people into the site and connects all the elements of the plan: the Entertainment Center, Park, Square, Paseos, Housing and Retail.

*Midway Rising* will be a connected community with over one mile of multi-use paths, wide sidewalks, paseos and greenways, and a rapid bus transit station on site. *Midway Rising* will be a green community with 14 acres of parks and open space, private and common open spaces integrated with residential buildings, and continuous tree canopy on all streets. And *Midway Rising* will be a vibrant community with pedestrian-scaled retail that faces and activates Frontier Drive and links to the Entertainment Center through a lively pedestrian promenade with dining, shops, and supporting uses.

Figure 3-1 Midway Rising Project Vicinity Map

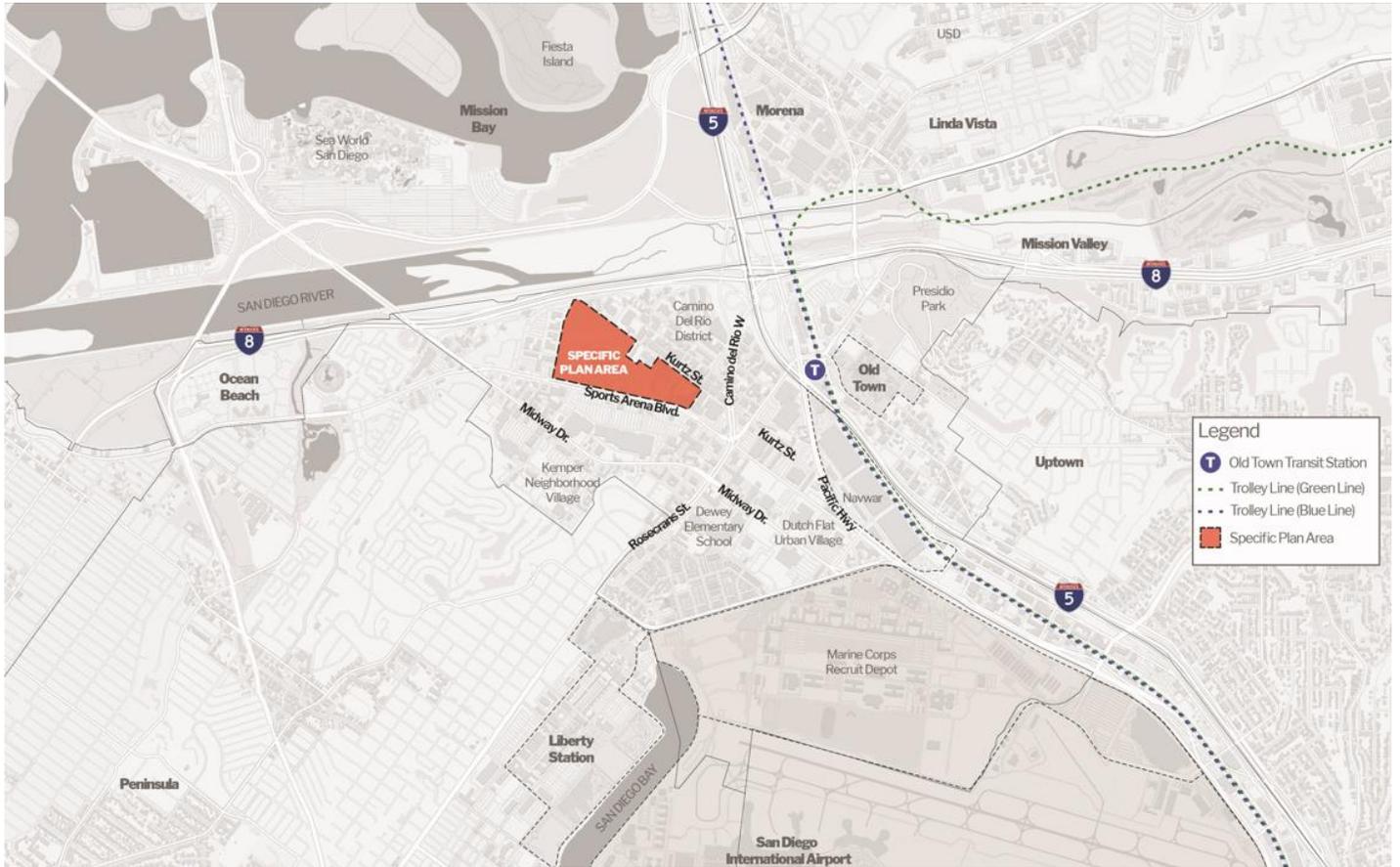


Figure 3-2 Midway Rising Project Site Plan



Figure 4 - Site Concept Illustrative\*

Discretionary actions associated with the *Midway Rising Project* include a Midway-Pacific Highway Community Plan Amendment; Midway Rising Specific Plan; Vesting Tentative Map; and Utility and Public Easement Vacations.

## 4. Demolition, Grading and Construction Waste

### 4.1. Demolition

The project site is the location of several buildings including the current San Diego Sports Arena. The demolition phase will include the deconstruction/demolition and removal of the existing buildings and surface parking on the site. Approximately 98,415 tons of waste are expected to be generated during demolition. Approximately 93,199 tons of material would be recycled, to include trees, concrete, asphalt, foundations, building structure, masonry walls, curb and gutter, and switch gear and cable. Approximately 5,216 tons of debris would be disposed in a landfill, to include non-useable lumber, drywall, glass, miscellaneous trash, roofing paper, broken roof tiles, and floor tile. Of note, specific items from the existing Arena will be salvaged and reused in the new entertainment center or may be preserved for historical value.

Table 4-1, *Midway Rising Project Waste Generation – Demolition*, summarizes the type and amount of demolition materials, as well as diversion/disposal.

Table 4-1 Midway Rising Project Waste Generation - Demolition

| Material Type        | Estimated Waste Quantity (tons) | Handling   | Estimated Diversion (tons) | Estimated Disposal (tons) |
|----------------------|---------------------------------|--|----------------------------|---------------------------|
| DEMOLITION WASTE     |                                 |  |                            |                           |
| Asphalt <sup>1</sup> | 439.0                           | FJ Willert Crushing Yard<br>9229 Harris Plant Road San Diego, CA 92126<br>(100% diversion) | 439.0                      | 0                         |
| Concrete             | 89,560                          | On Site Recycling via Crushing Equipment<br>(100% diversion)                               | 89,560                     | 0                         |
| Metal                | 3,200                           | SA Recycling<br>3055 Commercial St<br>San Diego, CA 92113<br>(100% diversion)              | 3,200                      | 0                         |
| Demolition Waste     | 5,216                           | Miramar Landfill<br>5180 Convoy Street San Diego, CA<br>92111<br>(0%diversion)             | 0                          | 5,594                     |
| TOTAL                | 98,415                          |  | 93,199                     | 5,594                     |

<sup>1</sup> Concrete will be recycled and/or re-used on-site.

#### 4.2. Grading

The proposed project would involve grading the previously disturbed site. Based on the preliminary *Midway Rising Project Grading Plan*, approximately 49 acres (approximately 100 percent) of the project site will be graded for development. The project would require approximately 514,000 cubic yards of cut and 550,000 cubic yards of fill. Approximately 36,000 cubic yards of material would be imported. It is currently estimated that up to 8,000 cubic yards of non-hazardous regulated waste soil will be encountered in the existing conditions. The waste soil is largely comprised of burn ash/burned waste and will require export to the facility listed in Table 4-2, *Midway Rising Project Waste Generation - Grading*, below. Testing will be completed for the 8,000 cubic yards of non-hazardous waste that is proposed to be exported. The 8,000 cubic yards of burn ash will be sampled, and the analytical results submitted to the Environmental Services Department for review prior to disposal. The sampling will be representative of the waste with a minimum of 35 samples for the 8,000 CY. The WMP will describe a plan to sample the soils and submit for review prior to disposal. The list of facilities authorized to handle such waste is updated quarterly and since the decision on which facility to use will be made at the time of construction, the developer reserves the right to select any City-certified authorized facility. Documentation supporting the waste determination including a description of the sampling strategy along with a copy of all laboratory analysis from a California certified laboratory, and a copy of the chain of custody must be submitted. Contamination levels must be less than the limits established by the accepting destination and may not exceed the maximum contaminant levels established by the San Diego Regional Water Quality Control Board in Addendum No. 1 to Order NO. 93-86, Maximum Concentration Limits for Soils Containing Nonhazardous Concentrations of Petroleum Hydrocarbons, Organic and Inorganic Compounds, Metals, and Pesticides for Municipal Solid Waste Landfills with Subtitle D Liners.

Table 4-2 Midway Rising Project Waste Generation - Grading

| Material Type | Estimated Waste Quantity (CY) | Handling  | Estimated Diversion (CY) | Estimated Disposal (CY) |
|---------------|-------------------------------|---|--------------------------|-------------------------|
| GRADING WASTE |                               |   |                          |                         |
| Impacted soil | 8,000                         | Miramar Landfill<br>5180 Convoy St, San Diego, CA 92111 | 0                        | 8,000                   |
| TOTAL         | 8,000                         |   | 0                        | 8,000                   |

### 4.3. Construction

Construction activities would generate packaging materials and unpainted wood, including 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 and/or would be collected by a contracted waste hauler and separated at the 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 construction & demolition ordinance. The types of construction waste anticipated to be generated include:

- Asphalt and Concrete
- Brick/Masonry/Tile
- Cardboard
- Carpet, Padding/Foam
- Drywall
- Landscape Debris
- Mixed C&D Debris
- Roofing Materials
- Scrap Metal
- Unpainted Wood and Pallets
- Garbage/Trash

In accordance with City WMP requirements, the City’s Construction and Demolition Ordinance, the City’s current diversion targets, and AB 341, a minimum of 75 percent of construction materials will be diverted. Strategies for material reduction, and reuse would be identified by the contractor prior to the start of work, 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.

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.

To the extent practical, either post-consumer recycled, or pre-consumer recycled materials would

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.

The following are examples of construction waste management strategies that may be utilized. Actual measures implemented will be reviewed by ESD at the preconstruction meeting as required by the project's Mitigation Monitoring and Reporting Program. Accepted measures will then be included in the contractor's construction documents.

- Recycling, salvage, reuse, and disposal options would be determined before each job begins.
- Advertisements would be placed in local newspapers announcing salvageable and reusable materials for sale or donation.
- Refuse haulers and recycling facilities would be selected based on their responsiveness to the recycling plan, fees, and geographic proximity to the job site.
- Solid waste management coordinator will be responsible for educating contractors and subcontractors regarding waste management plan requirements.
- Recycling areas would be clearly identified with large bilingual signs to ensure contamination rates in bins are below five percent by weight.
- Recycling bins would be placed in areas that would minimize misuse or contamination by employees and the public (location to be approved by ESD staff).
- Reuse building materials, use materials that have recycled content, or use materials that are derived from sustainable or rapidly renewable sources to the extent possible.

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, 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 Solid Waste Management Coordinator will help to ensure all diversion practices outlined in this Waste Management Plan are upheld and communicate goals to all contractors involved efficiently.

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

- Review the Solid Waste Management Plan including responsibilities of Solid Waste Management Coordinator.
- Work with contractors to estimate quantities of each type of material that will be salvaged, recycled, or disposed of as waste, then assist contractors with documentation.
- 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.

The contractors will perform frequent inspections of the construction site to ensure

compliance with the requirements of the Waste Management Plan and all other applicable laws and ordinances and report directly to the Solid Waste Management Coordinator. Inspections will include verifying the availability and number of dumpsters based on the volume of debris being generated, correct labeling of dumpsters, proper sorting, and segregation materials, and salvaging of excess materials. Additionally, the following apply:

- Solid waste management coordinator will be responsible for educating contractors and subcontractors regarding waste management plan requirements and ensuring that contractors and subcontractors carry out the measures described in the WMP.
- Solid waste management coordinator will ensure ESD attendance at a preconstruction meeting and assure compliance with segregation requirements, and verification of recycled content in base materials.
- Recycling areas will be clearly identified with large signs, approved by ESD, and enough 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.
- Solid waste management coordinator will be responsible for ensuring that contamination rates in bins remain below five percent by weight of the bin.
- 

Construction debris will be separated onsite into material-specific containers to facilitate reuse and recycling and to increase the efficiency of waste reclamation. In accordance with State diversion targets, the *Midway Rising Project* will implement a target of 75 percent for landfill diversion. 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.

## 5. Occupancy Phase

While the construction phase for the *Midway Rising Project* occurs as a one-time waste generation event, 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 *Midway Rising Project* will comply with the City’s Recycling Ordinance. Solid waste collection and disposal would be provided by a private hauler.

### 5.1. Implementation for the Multi-Purpose Entertainment Venue (Non-Residential Use)

Based upon information obtained from the CalRecycle, *2014 Generator-Based Characterization of Commercial Sector Disposal and Diversion in California*, it is estimated that at occupancy, the proposed entertainment center will generate .53 tons of waste per 1,000 visitors annually.

*Table 5-1 Generation Rate Summary by Weight: Arts, Entertainment, & Recreation (tons per 1,000 visitors per year)*

| Tons per 1,000 Visitors per Year  | Disposed | Curbside Recycle | Curbside Organics | Other Diversion | Generation  |
|-----------------------------------|----------|------------------|-------------------|-----------------|-------------|
| Arts, Entertainment, & Recreation | 0.43     | 0.03             | 0.01              | 0.06            | <b>0.53</b> |

While other types of building may calculate waste on a per employee or per square footage basis, public event venues categorize waste based on a per visitor metric. Therefore, based on that methodology, the new Entertainment Center may generate 795,000 tons of waste per year (Refer to Table 5-2).

Table 5-2 Occupancy Phase Annual Waste Generation

| Land Use                          | Visitors/year | Generation Rate<br>(tons per year, per<br>1,000 visitors) | Waste Generated | Expected<br>Percent<br>Diverted<br>from Source<br>Separated<br>Recycling | Estimated<br>Diverted | Estimated<br>Disposed |
|-----------------------------------|---------------|---|-----------------|--|-----------------------|-----------------------|
| Existing Sports<br>Arena          | 575,000       | 0.53  | 304,750         | 50   | 152,375               | 152,375               |
| Future<br>Entertainment<br>Center | 1,500,000     | 0.53  | 795,000         | 50   | 397,500               | 397,500               |
| Net Increase                      | 925,000       |   | 490,250         |  | 245,125               | 245,125               |

Targeted Statewide Waste Characterization Study: Waste Disposal and Diversion Findings for Selected Industry Groups (341-2006-0006)

Table 5-3 Estimate of Arena Organic Waste and Diversion (Tons per year)

|   |         |
|---|---------|
| Tons of solid waste disposed before organics recycling  | 245,125 |
| Estimated percentage of organics material generated in the City and delivered for landfill disposal | 32%*    |
| Estimated commercial and residential organic waste  | 78,440  |
| Project organics diversion of 75% with franchisee organic recycling program implemented             | 58,860  |
| Net landfill disposal total with recycled organics diverted   | 186,265 |

\*City's Recycling Ordinance

The City of San Diego's Municipal Code (§142.0801 – §142.0830) sets guidelines to ensure that a project provides the required space for the storage and collection of refuse and recyclable materials. Table 5-4 shows the exterior material storage area requirements for commercial developments. The new Entertainment Center proposes a total of 380,550 square feet of non-residential use. According to Table 5-4 below, the project is required to provide a minimum of approximately 731 square feet of refuse storage area, a minimum of approximately 731 square feet of organic waste storage area, and a minimum of approximately 731 square feet of recyclable material storage area, totaling an approximate 2,193 square feet of total storage area.

Table 5-4: Minimum Exterior Refuse and Recyclable Material Storage Areas for Non-residential Development

| Floor Area (Square Feet) | Minimum Refuse<br>Storage Area (Square<br>Feet) | Minimum<br>Recyclable<br>Material Storage<br>Area (Square Feet) | Minimum Organic<br>Waste Storage Area Per<br>Development<br>(Square Feet) | Total Minimum<br>Storage Area<br>(Square Feet) |
|--------------------------|---|---|---|--|
| 0-5,000                  | 12  | 12  | 12  | 36   |
| 5,000-10,000             | 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   |
| 100,001+       | 192<br>+ 48 for every 25,000<br>more than 100,001 | 192<br>+ 48 for every 25,000<br>more than 100,001 | 192<br>+ 48 for every 25,000<br>more than 100,001 | 576<br>+ 144 for every<br>25,000 more<br>than 100,001 |

Source: City of San Diego Municipal Code, Chapter 14, Article 2, Division 8: Refuse and Recyclable Material Storage Regulations, §142.0830, Table 142-08C, effective February 26, 2022.

According to the City’s Recycling Ordinance (City 2022a), organic material (such as food waste, yard waste, and lumber) accounted for approximately 32% of the waste generated in the City and delivered for landfill disposal. As shown in table 5-2 the expected increase in operational waste (as compared to existing use) generated by the project annually, considering compliance with City regulations for diversion, would be approximately 245,125 tons for the Entertainment Center estimated for disposal.

To comply with SB1383, the project would need to demonstrate diversion of 75% of organic waste following January 1, 2025. Based on implementation of new programs and mandates for recycling of food waste and the availability of organic material recycling services from franchised waste haulers, a 75% diversion of organic waste is anticipated. Only 75% diversion is assumed to account for individual non-compliance and assuming certain items would not be eligible for composting. With these assumptions, the project would be consistent with regulatory requirements for 75% organic material diversion. Based on a 75% diversion rate for organic materials, which are estimated to be approximately 78,440 tons annually for the Entertainment Center and diverted organic material would be approximately 58,860 tons annually for the Entertainment Center. The breakdown of organic waste diversion is summarized in Tables 5-3. The additional diversion of 58,860 tons of organics (including yard waste) would reduce occupancy landfill disposal to 186,265 tons annually for the Entertainment Center but would not reduce the estimated solid waste generation during project occupancy below the 60 tons per year threshold established for cumulative solid waste impacts.

To mitigate the cumulative impact on solid waste, the Entertainment Center as a part of the *Midway Rising Project* shall be responsible for implementing a long-term WMP, which would ensure that the facility would meet or exceed the requirements set by AB939 and AB341 once operational. The long-term WMP shall include compliance with the Recycling Ordinance; the provision of exterior storage space required for the project for refuse, recycle materials, and organic materials; and organics diversion as shown in the tables above

On-site recycling services will be provided for the Entertainment Center within the *Midway Rising Project*. The Entertainment Center will receive solid waste collection service and 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 the visitors to the facility. Recycling services are required by Section 66.0707 of the City of San Diego Land Development Code. Based on current requirements, these services shall include the following:

- Continuous assessment of new technologies for recycling, composting, cogeneration, and disposal to maximize efficient use of resources and environmental protection.
- 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.
- Utilization of recycling receptacles or containers which comply with the standards in the Container and Signage Guidelines established by the City of San Diego Environmental Services Department.
- Designated recycling collection and storage areas; and
- Signage on all recycling receptacles, containers, chutes, and/or enclosures which complies with the standards described in the Container and Signage Guidelines established by the City of San Diego Environmental Services Department

For the *Midway Rising Project* (as required by Section 66.0707 of the City of San Diego Land Development Code), the Entertainment Center operator or other designated personnel shall ensure that employees and commercial tenants are educated about the recycling services as follows:

- Information, including the types of recyclable materials accepted, the location of recycling containers, and responsibility to recycle shall be distributed annually to employees and other commercial tenants.
- New employees or other commercial tenants shall be given information and instructions upon occupancy; and
- All employees or commercial tenants shall be given information and instructions upon any change in the recycling service to the facility.

## 5.2. Implementation for Residential & Commercial Uses

In addition to the Entertainment Center, the project also contains both residential and commercial development. Table 5-5, *Minimum Exterior Refuse and Recyclable Material Storage Areas for Residential Development*, shows the required amount of refuse and recyclable storage for the residential portion of the project. The project proposes 4,254 multi-family homes. As a result, the project would require a minimum of 24,480 square feet of storage area that includes 8,160 square feet refuse storage area, 8,160 square feet of organic waste storage, and 8,160 square feet recyclable material storage area.

*Table 5-5: Minimum Exterior Refuse and Recyclable Material Storage Areas for Residential Development*

| Number of Dwelling Units | Minimum Refuse Storage Area (Square Feet) | Minimum Organic Waste Storage Area Per Development (Square Feet) | Minimum Recyclable Material Storage Area (Square Feet) | Total Minimum Storage Area (Square Feet) |
|--------------------------|---|--|--|--|
| 1                        | 6.25                                      | 6.25   | 6.25   | 18.75                                    |
| 2-6                      | 12  | 12   | 12   | 36                                       |
| 7-15                     | 24  | 24   | 24   | 72                                       |
| 16-25                    | 48  | 48   | 48   | 144                                      |
| 26-50                    | 96  | 96   | 96   | 288                                      |
| 51-75                    | 144                                       | 144  | 144  | 432                                      |

|                |   |   |   |  |
|----------------|---|---|---|--|
| <b>76-100</b>  | 192   | 192   | 192   | 576  |
| <b>101-125</b> | 240   | 240   | 240   | 720  |
| <b>126-150</b> | 288   | 288   | 288   | 864  |
| <b>151-175</b> | 336   | 366   | 336   | 1,008  |
| <b>176-200</b> | 384   | 384   | 384   | 1,152  |
| <b>201+</b>    | 384<br>+ 48 for every 25<br>Units above 201 | 384<br>+ 48 for every 25<br>Units above 201 | 384<br>+ 48 for every 25<br>Units above 201 | 1,152<br>+ 144 for every 25 Units<br>Above 201 |

Source: City of San Diego Municipal Code, Chapter 14, Article 2, Division 8: Refuse and Recyclable Material Storage Regulations, §142.0830, Table 142-08B, effective February 26, 2022.

Table 142-08C of the City of San Diego Municipal Code provides the Minimum Exterior Refuse and Recyclable Material Storage Areas for Non-residential Development. It is included above in Table 5-4 and defines the storage areas required for the commercial components of the *Midway Rising Project*. The *Midway Rising Project* provides 130,000 square feet of commercial retail space. It would be required to provide a minimum of 249 square feet refuse storage area, 246 square feet organic waste storage, and a minimum of 246 square feet recyclable material storage area for a total of approximately 738 square feet minimum exterior refuse and recyclable material storage area.

Based upon the factors that are used by the City of San Diego Environmental Services Department, the generation of waste per year was calculated based on the use intensity and is shown in Table 5-6 *Estimated Solid Waste Generation from the Commercial and Residential Components of the Midway Rising Project – Occupancy Phase*. During occupancy, the expected generated waste per year from the *Midway Rising Project* when fully occupied would be approximately 5,468 tons.

Table 5-6 *Estimated Solid Waste Generation from the Commercial and Residential Components of the Midway Rising Project – Occupancy Phase*

| Use  | Intensity<br>(Units or<br>Square feet) | Waste<br>Generation<br>Rate         | Estimated Waste<br>Generated<br>(tons/year) | Expected Percent                               | Estimated<br>Diverted | Estimated<br>Disposed |
|--|--|-------------------------------------|---|--|-----------------------|-----------------------|
|  |  |                                     |   | Diverted from<br>Source Separated<br>Recycling |                       |                       |
| Residential                                  | 4,254 units                            | 1.2<br>tons/year/unit               | 5,104                                       | 50   | 2,552                 | 2,552                 |
| Commercial-<br>General Retail<br>(Mixed-use) | 130,000<br>square feet                 | 0.0028<br>tons/year/squar<br>e feet | 364   | 50   | 182                   | 182                   |
| <b>TOTAL</b>                                 |  |                                     | <b>5,468</b>                                | <b>50</b>                                      | <b>2,734</b>          | <b>2,734</b>          |

Table 5-7 *Estimate of Commercial and Residential Organic Waste and Diversion (Tons per year)*

|   |       |
|---|-------|
| Tons of solid waste disposed before organics recycling  | 2,734 |
| Estimated percentage of organics material generated in the City and delivered for landfill disposal | 32%*  |
| Estimated commercial and residential organic waste  | 875   |

|   |       |
|---|-------|
| Project organics diversion of 75% with franchisee organic recycling program implemented | 656   |
| Net landfill disposal total with recycled organics diverted                             | 2,078 |

\*City's Recycling Ordinance (City 2022a)

According to the City's Recycling Ordinance (City 2022a), organic material (such as food waste, yard waste, and lumber) accounted for approximately 32% of the waste generated in the City and delivered for landfill disposal. As shown in Table 5-6, the expected increase in operational waste (as compared to existing use) generated by the project annually, considering compliance with City regulations for diversion, would be approximately 2,734 tons for the residential and commercial facilities estimated for disposal.

To comply with SB1383, the project would need to demonstrate diversion of 75% of organic waste following January 1, 2025. Based on implementation of new programs and mandates for recycling of food waste and the availability of organic material recycling services from franchised waste haulers, a 75% diversion of organic waste is anticipated. Only 75% diversion is assumed to account for individual non-compliance and assuming certain items would not be eligible for composting. With these assumptions, the project would be consistent with regulatory requirements for 75% organic material diversion. Based on a 75% diversion rate for organic materials, which are estimated to be approximately 875 tons annually for the commercial and residential facilities, and diverted organic material would be approximately 656 tons annually for the commercial and residential facilities. The breakdown of organic waste diversion is summarized in Table 5-7. The additional diversion of 656 tons of organics (including yard waste) from the residential and commercial components of the project would reduce the project occupancy landfill disposal to 2078 tons annually but would not reduce the estimated solid waste generation during project occupancy below the 60 tons per year threshold established for cumulative solid waste impacts.

To mitigate the cumulative impact on solid waste, Midway Rising Project shall be responsible for implementing a long-term WMP, which would ensure that the project meets or exceeds the requirements set by AB939 and AB341. The project's long-term WMP shall include compliance with the Recycling Ordinance; the provision of exterior storage space required for the project for refuse, recycle materials, and organic materials (refer to tables 5-4 & 5-5; and organics diversion.

On-site recycling services shall be provided to all tenants/residents within the *Midway Rising Project*. Tenants/residents within the project that receive solid waste collection service 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 the occupants. Recycling services are required by Section 66.0707 of the City of San Diego Land Development Code. Based on current requirements, these services shall include the following:

- Continuous assessment of new technologies for recycling, composting, cogeneration, and disposal to maximize efficient use of resources and environmental protection.
- 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.
- Utilization of recycling receptacles or containers which comply with the standards in the Container and Signage Guidelines established by the City of San Diego Environmental Services Department.
- Designated recycling collection and storage areas; and
- Signage on all recycling receptacles, containers, chutes, and/or enclosures which complies with the standards described in the Container and Signage Guidelines established by the City of San Diego Environmental Services Department

For the *Midway Rising Project* (as required by Section 66.0707 of the City of San Diego Land Development Code), the building management or other designated personnel shall ensure that occupants are educated about the recycling services as follows:

- 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.
- All new occupants shall be given information and instructions upon occupancy; and
- All occupants shall be given information and instructions upon any change in the recycling service to the facility.

### 5.3. Landscape and Green Waste Recycling

Plant material selection would 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, where practical, would utilize reclaimed water applied via low precipitation rate spray heads, drip emitters, or other highly efficient systems.

The Project is subject to comply with SB 1383 and the City of San Diego's Organic Waste Recycling Program and the landscape maintenance program will follow these code requirements. Landscape maintenance would include the collection of green waste and disposal of green waste at recycling centers that accept green waste. This would help further reduce the waste generated by developments within the Project during the occupancy phases.

## 6. Conclusion

The City of San Diego Development Services Department requires this preliminary WMP be prepared, and submitted to the City of San Diego's Environmental Services Department because the Project exceeds the significance thresholds for solid waste disposal as defined by the 2020 *California Environmental Quality Act Significance Determination Thresholds*. The project is currently in a site planning phase and as a result, this is a preliminary plan, which specifies the intent to meet the requirements of the Municipal Code, City Plans and Ordinances.

To ensure impacts are mitigated, the Project Applicant has prepared this WMP to explain and provide directions as to proposed methodology for salvage and recycling activities for the Project. This WMP will be implemented to the fullest degree of accuracy and efficiency.

The project will be required to adhere to City ordinances, including the Construction and Demolition Debris Diversion Deposit Program, the City's Recycling Ordinance, and the Refuse and Recyclable Materials Storage Regulations. The WMP plan for the *Midway Rising Project* is designed to implement and adhere to all city ordinance and regulations with regards to waste management.

## 7. References

CalRecycle. 2014. 2014 Generator-Based Characterization of Commercial Sector Disposal and Diversion in California. September 12, 2015. Available online:

<https://www2.calrecycle.ca.gov/WasteCharacterization/PubExtracts/2014/GenSummary.pdf>

City of San Diego. 2007. Recycling Ordinance. San Diego Municipal Code Chapter 6, Article 6, Division 7. November 20, 2007.

City of San Diego. 2008. Construction and Demolition Debris Diversion Deposit Program. San Diego Municipal Code Chapter 6, Article 6, Division 6.

City of San Diego. 2008. Construction and Demolition Debris Conversion Rate Table. San Diego Environmental Services Department. May 2008.

City of San Diego. 2013. California Environmental Quality Act Guidelines for a Waste Management Plan. June 2013. Available online:

<https://www.sandiego.gov/sites/default/files/legacy/environmentalservices/pdf/recycling/wmpguidelines.pdf>

City of San Diego. December 2020. California Environmental Quality Act Significance Determination Thresholds. Available online:

<https://www.sandiego.gov/sites/default/files/sdtceqa.pdf>

City of San Diego. 2022. Refuse and Recyclable Materials Storage Regulations. Municipal Code Chapter 14, Article 2, Division 8. February 26, 2022.