SUBJECT: **EDCO RECOVERY AND TRANSFER (ER&T) STATION**: RIGHT-OF-WAY VACATION to vacate adjacent alley, SITE DEVELOPMENT PERMIT (SDP) to amend SDP No. 8489, COASTAL DEVELOPMENT PERMIT (CDP) to amend CDP No. 8488 and TENTATIVE MAP to allow for the expansion of the existing ER&T facility and increase the solid waste diversion that would support City of San Diego Zero Waste goals of the Climate Action Plan. In addition, the project would require the acquisition of two portions (approximately 155 square feet and 250 square feet) of real property within the dedicated right-of-way located between Una and Vesta Street. The site would be expanded to include the parcel to the north and the alleyway to the east, which would increase the site size from 1.61 to 2.03 acres. The existing building would be expanded by 31,130 square feet, to a total of 60,680 square feet. The three driveways on Dalbergia Street would be consolidated into a single, 45-foot-wide, driveway, and the 20-foot-wide alleyway would be vacated and widened to a 35-foot-wide driveway located on Vesta Street. Although additional equipment would be added for mechanized processing and anaerobic digestion to achieve a higher waste diversion rate, the ER&T facility would continue to operate within the existing permitted capacity of 1,500 tons per day. In addition, the internal processing hours would be extended to 24 hours per day and receiving hours would be extended by one hour to 5:00 a.m. to 7:00 p.m. Operations would be extended to include Sundays in addition to Monday through Saturday. The proposed facility expansion and enhancement is anticipated to support the recovery of additional cardboard, mixed paper, mixed rigid plastics, steel, asphalt, concrete, wood, and green waste. The project would also construct associated site improvements (i.e., hardscape, site utilities, drainage improvements, landscaping, site parking, and walls). Allowable deviations from development regulations are being requested pertaining to driveway widths, building height, fencing, and to utilize on-street parking spaces to satisfy parking requirements. The project is in conformance with the criteria of the Affordable/In-Fill Housing and Sustainable Buildings Expedite Program. The 1.61-acre site is located at 3660 Dalbergia Street. The site is designated Residential/Commercial/Industrial and zoned IH-2-1 within the Barrio Logan/ Harbor 101 Community Plan area. Additionally, the project is within the Coastal Overlay Zone (Non-appealable Area 2), Parking Impact Overlay Zone, Promise Zone, and the Outdoor Lighting Zone (Zone 3 – Medium). (LEGAL DESCRIPTION: Lots 12 & 22 Block 262 Noel's Subdivision Map No. 457; Lots 3 & 23 & SELY 4' of LOT 2 Block 262 Guion's Addition Map No. 220; Lots A & B Block 262 of Arlington Map No. 1638; Assessor's Parcel Numbers 550-620-02 through 10.) Applicant: EDCO Disposal Corporation.
UPDATE: October 22, 2018. Revisions and/or minor corrections have been made to the final document when compared to the draft Mitigated Negative Declaration. In accordance with the California Environmental Quality Act, Section 15073.5(c)(4), the addition of new information that clarifies, amplifies, or makes insignificant modifications does not require recirculation as there are no new impacts and no new mitigation identified. An environmental document need only be recirculated when there is the identification of new significant environmental impacts or the addition of a new mitigation measure required to avoid a significant environmental impact. The modifications within the environmental document do not affect the environmental analysis or conclusions of the Mitigated Negative Declaration. All revisions are shown in a strikethrough and/or underline format.

I. PROJECT DESCRIPTION:
See attached Initial Study.

II. ENVIRONMENTAL SETTING:
See attached Initial Study.

III. DETERMINATION:
The City of San Diego conducted an Initial Study which determined that the proposed project could have a significant environmental effect in the following areas(s): Air Quality. Subsequent revisions in the project proposal create the specific mitigation identified in Section V of this Mitigated Negative Declaration. The project as revised now avoids or mitigates the potentially significant environmental effects previously identified, and the preparation of an Environmental Impact Report will not be required.

IV. DOCUMENTATION:
The attached Initial Study documents the reasons to support the above Determination.

V. MITIGATION MONITORING AND REPORTING PROGRAM:
A. GENERAL REQUIREMENTS – PART I Plan Check Phase (prior to permit issuance)

1. Prior to the issuance of a Notice To Proceed (NTP) for a subdivision, or any construction permits, such as Demolition, Grading or Building, or beginning any construction related activity on-site, the Development Services Department (DSD) Director's Environmental Designee (ED) and Local Enforcement Agency (LEA) shall review and approve all Construction Documents (CD), (plans, specification, details, etc.) to ensure the MMRP requirements are incorporated into the design.

2. In addition, the ED shall verify that the MMRP Conditions/Notes that apply ONLY to the construction phases of this project are included VERBATIM, under the heading, "ENVIRONMENTAL/MITIGATION REQUIREMENTS."
3. These notes must be shown within the first three (3) sheets of the construction documents in the format specified for engineering construction document templates as shown on the City website: http://www.sandiego.gov/development-services/industry/standtemp.shtml

4. The **TITLE INDEX SHEET** must also show on which pages the "Environmental/Mitigation Requirements" notes are provided.

5. **SURETY AND COST RECOVERY:** The Development Services Director or City Manager may require appropriate surety instruments or bonds from private Permit Holders to ensure the long-term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

**B. GENERAL REQUIREMENTS – PART II Post Plan Check (After permit issuance/Prior to start of construction)**

1. **PRECONSTRUCTION MEETING IS REQUIRED TEN (10) WORKING DAYS PRIOR TO BEGINNING ANY WORK ON THIS PROJECT.** The PERMIT HOLDER/OWNER is responsible to arrange and perform this meeting by contacting the CITY RESIDENT ENGINEER (RE) of the Field Engineering Division, City staff from MITIGATION MONITORING COORDINATION (MMC), and LEA. Attendees must also include the Permit holder's Representative(s), Job Site Superintendent and the following consultants: Paleontological Monitor.

   **Note:** Failure of all responsible Permit Holder's representatives and consultants to attend shall require an additional meeting with all parties present.

   **CONTACT INFORMATION:**
   a) The PRIMARY POINT OF CONTACT is the RE at the Field Engineering Division 858-627-3200.
   b) For Clarification of ENVIRONMENTAL REQUIREMENTS, it is also required to call RE and MMC at 858-627-3360.

2. **MMRP COMPLIANCE:** This Project, Project Tracking System (PTS) Number 515674 and/or Environmental Document Number 515674, shall conform to the mitigation requirements contained in the associated Environmental Document and implemented to the satisfaction of the DSD's Environmental Designee (MMC), the City Engineer (RE), and LEA. The requirements may not be reduced or changed but may be annotated (i.e., to explain when and how compliance is being met and location of verifying proof, etc.). Additional clarifying information may also be added to other relevant plan sheets and/or specifications as appropriate (i.e., specific locations, times of monitoring, methodology, etc.)
Note: Permit Holder's Representatives must alert RE and MMC if there are any discrepancies in the plans or notes, or any changes due to field conditions. All conflicts must be approved by RE and MMC BEFORE the work is performed.

3. **OTHER AGENCY REQUIREMENTS:** Evidence of compliance with all other agency requirements or permits shall be submitted to the RE, MMC, and LEA for review and acceptance prior to the beginning of work or within one week of the Permit Holder obtaining documentation of those permits or requirements. Evidence shall include copies of permits, letters of resolution or other documentation issued by the responsible agency:

4. **MONITORING EXHIBITS:** All consultants are required to submit to RE and MMC, a monitoring exhibit on a 11x17 reduction of the appropriate construction plan, such as site plan, grading, landscape, etc., marked to clearly show the specific areas including the LIMIT OF WORK, scope of that discipline's work, and notes indicating when in the construction schedule that work will be performed. When necessary for clarification, a detailed methodology of how the work will be performed shall be included.

Note: Surety and Cost Recovery: When deemed necessary by the DSD Director or City Manager, additional surety instruments or bonds from the private Permit Holder may be required to ensure the long-term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

5. **OTHER SUBMITTALS AND INSPECTIONS:** The Permit Holder/Owner's representative shall submit all required documentation, verification letters, and requests for all associated inspections to the RE, MMC, and LEA for approval per the following schedule:

<table>
<thead>
<tr>
<th>Document Submittal/Inspection Checklist</th>
</tr>
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<tbody>
<tr>
<td><strong>Issue Area</strong></td>
</tr>
<tr>
<td>General</td>
</tr>
<tr>
<td>General</td>
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<tr>
<td>General</td>
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<tr>
<td>Air Quality</td>
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<tr>
<td>Waste Management</td>
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<tr>
<td>Bond Release</td>
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</tbody>
</table>
C. SPECIFIC MMRP ISSUE AREA CONDITIONS/REQUIREMENTS

Air Quality

AIR-1: Odor Minimization through Site Design

Requirements on Applicant
Prior to building permit issuance of the anaerobic digester facility, the Applicant (EDCO Disposal Corporation) shall demonstrate to the satisfaction of City's LEA and Department of Development Service (DSD) environmental designee that the following measures are shown on the project building plans:

- The anaerobic digester facility including the anaerobic digesters and the area where feedstock will be received shall be enclosed and include a gas monitoring meter.
- A separate exhaust air system shall be installed to maintain an inward air flow from all entrances to the anaerobic digester facility and outflow through a biofilter exhaust system to ensure that odor from the anaerobic digester facility is not detectible at adjacent property lines.
- The biofilter exhaust system shall be equipped with ammonia and hydrogen sulfide removal components.
- Exhaust flares shall be designed such that natural gas generated by the anaerobic digester facility may be supplemented with utility-provided natural gas to maintain uninterrupted combustion of exhaust gases during all phases of operation of the anaerobic digester facility.
- Compressed natural gas intended for use as vehicle fuel shall be processed to remove odorous compounds such as hydrogen sulfide.

AIR-2: Odor Minimization through Management Practices

Requirements on Applicant
Prior to operations of the anaerobic digester facility, the Applicant shall submit an Odor Impact Management Plan (OIMP) or Best Odor Management Practice Feasibility Report for the review and approval of the LEA consistent with California Code of Regulations (CCR) Title 14 Sections 17896.30 or 17896.31. The Applicant shall notify LEA of any changes to management practices outlined in the odor minimization plan prior to implementation of changes as feasible. The odor minimization plan shall outline implementation of the following management practices including, but not limited to the following:

- The Applicant shall designate and train staff members responsible for response to odor complaints. Upon receipt of a complaint, a designated staff member shall:
  o Document the odor complaint.
- Go to the location at which the odor complaint originated or the nearest property line to the location at which the complaint originated.
- Investigate anaerobic digester equipment for possible sources of odors.
- Where an odor source is identified, promptly implement reasonable control measures to reduce or eliminate the source of the odor.
- Where an odor source is identified and control measures do not eliminate the source of the odor, the staff member shall notify and consult with San Diego Air Pollution Control District staff within 24 hours.

  - The exhaust air system shall be active at all times when doors to the anaerobic digester facility are open and as needed to control odor.
  - Implement best management practices to prevent and/or promptly remove standing water from the site.
  - Where loads are overly contaminated and/or odoriferous and may release odors upon tipping, loads shall be rerouted to landfills.

VI. PUBLIC REVIEW DISTRIBUTION:

Draft copies or notice of this Mitigated Negative Declaration were distributed to:

- **State of California**
  - Caltrans District 11 (31)
  - CalRecycle (35)
  - California Regional Water Quality Control Board, Region 9 (44)
  - State Clearinghouse (46A)
  - California Coastal Commission (47)
  - California Coastal Commission (48)
  - California Air Resources Board (49)

- **County of San Diego**
  - Air Pollution Control District (65)

- **City of San Diego**
  - Mayor's Office (91)
  - Councilmember Bry, District 1 (MS 10A)
  - Councilmember Zapf, District 2 (MS 10A)
  - Councilmember Ward, District 3 (MS 10A)
  - Councilmember Cole, District 4 (MS 10A)
  - Councilmember Kersey, District 5 (MS 10A)
  - Councilmember Cate, District 6 (MS 10A)
  - Councilmember Sherman, District 7 (MS 10A)
  - Councilmember Alvarez, District 8 (MS 10A)
  - Councilmember Gomez, District 9 (MS 10A)
  - Development Services Department
EAS  
Transportation  
LDR Planning  
Engineering  
Geology  
Landscape  
PUD Water & Sewer  
Project Manager  
Local Enforcement Agency  
Planning Department  
Plan-Long Range Planning  
Plan Facilities Financing  
Environmental Services Department  
Lisa Wood (MS 1102A)  
Renee Robinson  
Jennifer Ott  
Transportation Development - DSD (78)  
Development Coordination (78A)  
Fire and Life Safety Services (79)  
Library Department - Government Documents (81)  
Central Library (81A)  
Logan Heights Branch Library (81N)  
Facilities Financing (93B)  
City Attorney (93C)  

Other Organizations, Groups and Interested Individuals  
Back Country Against Dumps (162)  
Barrio Logan (240)  
Barrio Station Inc. (241)  
Harborview Community Council (245)  
Clint Linton, Ipay Nation of Santa Ysabel  
Lisa Cumper, Jamul Indian Village  
Jesse Pinto, Jamul Indian Village  
Jerry Rivero  
Lewis Wise, San Diego Galvanizing Incorporated  
G.R. Myers  
Jaime Garcia, Safrio Portable Toilets  
Efran Rodriguez, MC Auto Electric  
Denise Huelsbeck, DECA Forklift, Inc.  
Alfredo Aldaba  
Bill Davila, World Famous Sports  
Jacie Mendiola, San Diego Collision Specialist  
Michael Tardy, Dimensional Silk Screen Inc.  
Nelson Sanabria, Mac Sculpture  
Steve South, EDCO Disposal Corporation  
Jennifer Campos, RECON Environmental
VII. RESULTS OF PUBLIC REVIEW:

( ) No comments were received during the public input period.

( ) Comments were received but did not address the accuracy or completeness of the draft environmental document. No response is necessary and the letters are incorporated herein.

(X) Comments addressing the accuracy or completeness of the draft environmental document were received during the public input period. The letters and responses are incorporated herein.

Copies of the draft Mitigated Negative Declaration, the Mitigation, Monitoring and Reporting Program and any Initial Study material are available in the office of the Entitlements Division for review, or for purchase at the cost of reproduction.

E. Shearer-Nguyen
Senior Planner
Development Services Department

September 18, 2018
Date of Draft Report

October 22, 2018
Date of Final Report

Analyst: Elizabeth Shearer-Nguyen

Attachments: Initial Study Checklist
Figure 1: Regional Location
Figure 2: Project Location on USGS Map
Figure 3: Project Location on City 800’ Map
Figure 4: Project Location on Aerial Photograph
Figure 5: Site Plan
October 5, 2018

Elizabeth Shearer-Nguyen, Environmental Planner
City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101

Subject: Notice of a Draft Mitigated Negative Declaration, EDCO Recovery and Transfer Station, Facility No. 37-AA-0155

Dear Ms. Shearer-Nguyen:

Thank you for allowing the Department of Resources Recycling and Recovery (CalRecycle) staff to provide comments on the proposed project and for your agency’s consideration of these comments as part of the California Environmental Quality Act (CEQA) process.

PROJECT DESCRIPTION

EDCO Recovery and Transfer Station (ER&T) is an existing permitted large volume transfer/processing facility owned and operated by the EDCO Disposal Corporation. The facility is located at 3860 Dalbergia St., San Diego. The City of San Diego, acting as Lead Agency, has prepared and circulated a Draft Mitigated Negative Declaration (MND) for the expansion of the existing ER&T facility to increase the solid waste diversion that would support the City of San Diego Zero Waste goals identified in the City’s Climate Action Plan.

The proposed project would request the following modifications:

1) increase the facility size from 1.61 to 2.03 acres;
2) the existing building would be expanded by 31,130 square feet, to a total of 60,680 square feet;
3) three driveways on Dalbergia Street would be consolidated into a single, 45-foot-wide, driveway, and the 20-foot-wide alleyway would be vacated and widened to a 35-foot wide driveway located on Vesta Street;
4) additional equipment would be added for mechanized processing to support the recovery of additional cardboard, mixed paper, mixed rigid plastics, steel, asphalt, concrete, wood, and green waste;
5) construction of an anaerobic digestion facility;
6) construct associated site improvements such as hardscape, drainage, landscaping, site parking, and walls;
7) internal processing hours would be extended to 24 hours per day;
8) receiving hours would be extended by one hour from 6:00 a.m. to 7:00 p.m. to 5:00 a.m. to 7:00 p.m.; and,
9) operations would be extended to include Sundays in addition to Monday through Saturday.

A-1 Introductory Comment. Responses to specific comments in this letter are provided below.
The operational staff hours, as noted in the comment, are between the hours of 4:00 am and 1:00 p.m. and 2:00 p.m. to 11:00 p.m. to support receiving and sorting operations.

Internal processing is the mechanized and manual recovery of recyclables from the municipal solid waste stream.

The project would allow internal processing 24 hours/day. While the facility would be permitted to operate 24 hours/day, standard daily operations would typically occur between 4 a.m and 11 p.m. While most operations would occur within these hours, 24 hour/day operations would be allowed to provide for flexibility to accommodate surges in inbound tonnage (within permitted daily tonnage), addressing operational issues as they arise, as well as equipment maintenance. As a result of these operational demands, it is possible the first shift may be required to start earlier and the second shift stay later, thus the flexibility of up to 24 hours internal processing. Revisions were incorporated into the Final IS/MND in the Project Description and in Section XVI. Transportation/Traffic to clarify how many employees would be on-site and to clarify the purpose of 24-hour operations.

As described in the Draft IS/MND and further detailed in the Final IS/MND, changes in project operations are not anticipated to result in significant noise impacts as described below.

Due to the location of I-5, the project site is located within a 75 dB CNEL noise contour associated with traffic noise, identified in the Barrio Logan Community Plan EIR analysis. The project site, as well as all surrounding properties of concern, are exposed to traffic noise from I-5, which exceeds 70 dB even during the nighttime hours. Thus, all project traffic and operational noise would have a less than significant effect on the existing and future noise environment in the project area, as I-5 is the dominant noise source during all hours of the day and week.
The Final IS/MND was revised to include additional clarification regarding evaluating the change in ambient noise conditions. This analysis concluded that exterior noise levels for the proposed building would range between 40 and 45 dB due to building attenuation of noise. Considering ambient noise conditions, project operations would not result in a perceptible change in noise on Sundays and during nighttime and early morning hours. While the ambient noise condition may be lower during nighttime hours and weekends (Sundays), noise levels on the project site would be below ambient conditions.

Noise levels at the surrounding property lines would not exceed applicable City thresholds. While operating hours would be extended to 24 hours and receiving hours would be extended by one hour, starting at 5:00 a.m. and including Sundays, impacts would be less than significant impact and therefore, mitigation would not be required as identified in the draft MND.
A-4 Refer to comment A-3 above. The final MND, Section XII(a), was revised to include additional clarification regarding evaluating the change in ambient noise conditions in relation to surrounding sensitive receptors. Section XII(a) provides a discussion of anticipated noise levels, noise reductions anticipated due to building features, and the resultant noise levels at property lines of sensitive receptors. As concluded in the draft MND, the project would not exceed applicable thresholds. Therefore, impacts would be less than significant and mitigation would not be required.

A-5 The site expansion and reconfiguration of the driveways on Dalbergia Street and Vesta Street would improve on-site circulation by physically separating the inbound and outbound collection truck lanes, as well as physically separating the movement of the larger transfer tractor-trailers from the collection trucks. In addition, the project adds one new inbound scale and lane and one new outbound scale and lane for weighing collection and transfer/haul trucks, which are anticipated to reduce the average time of collection trucks waiting to enter the facility.

A-6 Disposal of the digestate would be hauled to another facility that would take the digestate and further refine it for compostable products for sale. The proposed project would comply with all regulatory requirements regarding the use and placement of the resulting digestate and/or compost.

A-7 The staging area would serve as a receiving floor for incoming materials. Materials that are tipped can be inspected and contaminants removed. The staging area would be sized to provide temporary storage and space for blending of sorted materials that would become feedstock for the digester. Sufficient volume would be provided to contain at least a full day's feedstock requirements. The staging area would have a coiling overhead door that would be kept closed except during entry or exit of collection vehicles and a ventilation system to allow capture and treatment of odors from the
staged materials. As identified in the Draft IS/MND, mitigation measures AIR-1 and AIR-2 would be implemented to ensure adverse impacts are reduced to less than significant.

A-8 The project would comply with Title 14, Division 7, Chapter 3.2, Article 6, Section 17896.57(3). When the 21-day digestion process is complete, digestate would be separated into wet and high solids fractions, and the high solids fraction would be directly placed into transfer vehicles for off-site hauling. Solid digestate would not be stored on-site. The solid digestate would stay in the digesters until ready for removal and loadout. An enclosed holding tank would be provided for the wet fraction, which would be transferred offsite in tanker trucks.
A-9 As described in Section XVIII(g) of the Draft IS/MND, impacts associated with solid waste disposal would be less than significant.

A-10 Implementation of mitigation measures AIR-1 and AIR-2 would reduce impacts associated with odor to a level less than significant.

A-11 Conclusory remarks. No response is required.

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The City of San Diego, Development Services Department is the Local Enforcement Agency (LEA) and is responsible for providing regulatory oversight of solid waste handling activities, including inspections, enforcement, and permitting. Please contact the LEA, Bill Prinz, at 619-533-3686 to discuss the regulatory requirements for the proposed project.

The following internet link accesses Title 14 CCR, Chapter 3.2, which provides state minimum standards and other regulatory requirements applicable to in-Vessel Digestion:
https://code.westlaw.com/calleges/Browse/Home/California/CaliforniaCodedRegulations?guide=14CPCR%3C%3E14.05%09%3C%3E14.05%09&navigationContext=document&transitionType=Default&contextIdentifier=Default

Please refer to Title 14 CCR, section 17886.31 – Odor Minimization Plan, for requirements relative to odors resulting from in-vessel digestion.

CONCLUSION

CalRecycle staff thanks the Lead Agency for the opportunity to review and comment on the draft MND.

CalRecycle staff requests copies of any subsequent environmental documents, copies of public notices and any Notices of Determination for this proposed project.

If the environmental document is adopted during a public hearing, CalRecycle staff requests 10 days advance notice of this hearing. If the document is adopted without a public hearing, CalRecycle staff requests 10 days advance notice of the date of the adoption and proposed project approval by the decision making body.

If you have any questions regarding these comments, please contact me at 918.341.6719 or by e-mail at Cody.Oquendo@CalRecycle.ca.gov.

Sincerely,

Cody Oquendo, Environmental Scientist
Permitting & Assistance Branch – South Unit
Waste Permitting, Compliance & Mitigation Division
CalRecycle

cc: Martin Perez, Supervisor
Permitting & Assistance Branch – South Unit

Bill Prinz, Supervisor
City of San Diego LEA
September 26, 2018

City of San Diego Development Services Center
Attn: E. Shearer-Nguyen, Environmental Planner
desigas@sandiego.gov
1222 First Avenue, MS 501
San Diego, CA 92101

Re - EDCO Recovery and Transfer Station, Project No. 515674

To Whom It May Concern,

Our family has owned and operated San Diego Galvanizing, Inc. since 1967 and we are located at 3586 Dalbergia Street, San Diego, CA 92113, which is one block from the EDCO facility. In addition to 3586 Dalbergia Street, we also own the property immediately adjacent to the EDCO facility, at 3602 Dalbergia Street.

We are aware of and fully support the scope of the overall improvements proposed by EDCO, including closing the alley, expanding the building to increase recycling, Sunday operations, enhancing the traffic lanes and introducing Anaerobic Digestion to capture methane from existing food waste. We believe that the allowance of up to 24 hour work inside the building will also create a stabilizing influence on the area and reduce negative overnight activities, which have been worsening over the last couple of years. I also expect that the enhanced traffic flow efficiencies resulting from their improvements will have a direct positive impact to customer access to our own business and to traffic flow and safety in the area.

EDCO is our family owned and operated company that has always been a responsible and good neighbor. I strongly feel that this development will bring a positive change to our area and as such, I urge your swift and favorable consideration of this project.

Please feel free to contact me with any questions.

Sincerely,

Lewis Wise
President
Subject: EDCO LETTER PROJECT
From: "alicia garcia" <alicia@safiros.com>
Date: Wed, September 26, 2018 12:43 pm
To: Jaime@safiros.com
Priority: Normal

SAFIRO'S PORTABLE TOILETS LLC,

September 26, 2018

E. Shearer-Nguyen
Environment Planner
City of San Diego Development Service Center
1222 First Avenue, MS 501
San Diego, CA 92101

Dear E. Shearer-Nguyen,

I would like to express my support for the EDCO Recovery and Transfer Station project and its proposed facility improvements. The project number is 515674.

The facility serves as a convenient option for residents and business to properly dispose of waste and will soon include Sundays as an option(101,723),(496,944). Since taking over operations, EDCO has been a good corporate citizen and neighbor to the residents in this vicinity.

Sincerely,

Jaime Garcia, Owner

Safiro Portable Toilet:
3688 CALBERGIA STREET
SU N CARLSBAD, CA 92011
PH: (519) 232-8606

C-1 Comment noted.
September, 2018

To: E. Shearer-Nguyen
   Environmental Planner
   City of San Diego Development Services
   1222 First Avenue, MS 501
   San Diego, CA  92101
   
From: G. R. Meyers
   3712 Dalbergia Street
   San Diego, CA  92113
   
Subj: EDCO Recovery and Transfer Station - Project No. 515674

D-1  For many years I have owned the property at 3712 and 3704 Dalbergia Street, as well as 1929 and 1931 Vesta Street. These properties are directly across from the southern side of the EDCO facility as well as the current alley.  

I support the proposed improvements as they are needed and EDCO does a good job in keeping the facility clean. Closing the alley will also be appreciated by the community and will prevent crime.  

I understand the 48' building height of the new buildings are needed for increased recycling, which is a worthy goal. The jobs that the recycling will create in the community is also beneficial.  

I have always been pleased with the operations of the facility and the fact that EDCO works hard to be a good neighbor and is a local company. I have supported previous EDCO permits and have never been disappointed with the results.  

Please feel free to contact me about this letter or other matters at any time.

Very Respectfully

G. R. Meyers  9-25-18

D-1  Comment noted.
MC Auto Electric
3683 1/2 Dalbergia Street
San Diego, CA 92113
619.234.5707
“Specializing in Fuel Injection, Electrical & Mechanical”

September 26, 2018

E. Shearer-Nguyen
Environmental Planner
City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101

E. Shearer-Nguyen,

MC Auto Electric supports the proposed improvements to EDCO Recovery and Transfer Station, #515674.

Our company has operated across the street for many years from EDCO and always found them to be good neighbors with a well-maintained facility that works well within the community. We understand the project will reduce the amount of trash landfilled, close the alley and expand the building, all of which we support. In addition, the proposed changes have better traffic patterns.

Thank you for considering our support.

Respectfully,

Efrain Rodriguez
General Manager

Comment noted.
September 28, 2018
E. Sheerer-Nguyen
EDCO Recovery and Transfer Station / Project No. 515674
Environmental Planner
City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101

We are aware of EDCO’s proposed plans to further develop their site and are strongly supportive.

EDCO has kept us informed on their plans and we believe the project will be good for the City and our immediate area. We have always found EDCO to be a good neighbor, very approachable and always solution oriented.

Founded in 1972, Deca Forklift, Inc. is located at 3596 Dalbergia Street, San Diego, CA 92113. Our family owns this property as well as the property across the street at 3591 Dalbergia Street, so we are long time property and business owners on the street.

The EDCO project brings multiple improvements to the site and while they are all beneficial, we believe closing the current alley behind EDCO is critical. Closing the alley will improve safety and reduce overnight crime in the area.

Feel free to add our names as supporters and please approve this project.

Respectfully,

Denise Huelbsheek
President

F-1  Comment noted.
October, 2018

E. Shearer-Nguyen
Environmental Planner
City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101 - EDCO Recovery and Transfer Station, Project No. 515674

Dear City of San Diego,

G-1

We are familiar with the proposed improvements by EDCO to expand the building size, close the existing alley, add more scales, open on Sundays and process recycling overnight inside the facility. We support these improvements and believe it will help meet recycling goals as well as improve overnight security on our street.

The alley has always been a source of illegal activities and while EDCO does a good job of keeping it clean, overnight the situation returns. In addition to closing the alley, the increased overnight presence of workers will deter crime and create jobs.

We have operated for many years across from EDCO and have not experienced any issues. We urge your support –

Sincerely,

Alfredo Aldaba
October 2, 2018

E. Shearer-Nguyen  
EDCO Recovery and Transfer Station / Project No. 515674
Environmental Planner
City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101

Dear Mr. Shearer-Nguyen,

World Famous Sports has operated for many years directly across the street from EDCO on Dalbergia Street, San Diego. We are aware of EDCO’s proposed plans to further develop their site on both sides as well as closing the alley and agree with the improvements.

We believe the upgrades will assist the City in meeting recycling goals, infill an existing vacant parcel, close the alley next to 1-5 and allow for smoother traffic flow in and out of the facility. These improvements will benefit our immediate area —

As a fellow family owned and operated company, we understand the challenges of managing expectations. EDCO has always tried to be a good neighbor and solve any issue that arises.

We urge your support of the EDCO project. Please feel free to contact me if I can provide any additional information.

Sincerely,

Bill Davila
President

3625 Dalbergia St., Ste. A • San Diego, CA 92113 • (619) 231-4800 • (800) 848-9848 • Fax (619) 231-1717

H-1 Comment noted.
I-1 Comment noted.

San Diego Collision Specialist supports the proposed EDCO project.

We have been located near EDCO for many years and have not had any issues. EDCO is a responsible company, the facility is well kept and we have no reason to believe the new facility will be any different.

Allowing EDCO to work overnight inside the facility and closing the alley will assist in deterring crime in our area. The building expansion seems required to accommodate recycling laws and works within the area.

Jacie Mendiola
San Diego Collision Specialist
3713 Dalbergia Street
San Diego, CA 92113
October 9, 2018
Re: EDCO - Project No. 515674

E. Shearer-Nguyen
Environmental Planner
City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101

Dear Ms. Shearer-Nguyen,

Dimensional Silk Screen has been leading the digital and screen print industry for over 40 years and is now San Diego’s biggest large format screen and digital printer. We are located at 3750 Dalbergia Street, San Diego, CA 92113.

We are aware of the improvements proposed by EDCO and believe they will be beneficial to our local community and the region as a whole. Our understanding of what is proposed includes, but is not limited to, the following:

- Closing the alley and increasing the current building size to the east and south
- Allow for internal processing up to 24 hours per day
- Open for receiving at 5:00 a.m. instead of current 6:00 a.m.
- Install new recycling lines
- Maintain existing weekday tonnage and traffic limits
- Open on Sundays for receiving
- Adding Anaerobic Digestion to make renewable power

The alley closure, overnight operations and Sunday activities will also serve to deter unwanted criminal activity on our street. On a street that is adjacent to the impacts of I-5, EDCO has always been accessible, community based and responsive to the dynamics of our area.

As such, Dimensional supports the improvements and hopes the permits are approved to advance this project. Thank you.

Sincerely,

Michael Tardy
President

J-1 Comment noted.
October 12, 2018

E. Shearer-Nguyen
Environmental Planner
City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101

I write today in support of EDCO Project Number 515674.

We strongly support improvements to the area and believe that the EDCO project will achieve these objectives. Although we are an industrial area, we believe that the improved lighting, overnight working activity, closing the alley and increased employment will be positive additions to the community. In addition, infill of the currently vacant parcel to create a better traffic flow will be well received.

While I realize this has been a very lengthy process, it is now time to allow this project to move forward.

Thank you for your consideration of my opinion.

Regards,

Nelson Sanabria
Owner

K-1 Comment noted.
INITIAL STUDY CHECKLIST

1. Project title/Project number: EDCO Recovery and Transfer Station Expansion/515674

2. Lead agency name and address: City of San Diego, 1222 First Avenue, MS-501, San Diego, California 92101

3. Contact person and phone number: E. Shearer-Nguyen / (619) 446-5369

4. Project location: 3660 Dalbergia Street, San Diego, CA 92113

5. Project Applicant/Sponsor's name and address: Steve South, President, EDCO Disposal Corporation, 6670 Federal Boulevard, Lemon Grove, CA 91945

6. General/Community Plan designation: Residential/Commercial/Industrial

7. Zoning: BLPD-SUBD-B

8. Description of project (Describe the whole action involved, including but not limited to, later phases of the project, and any secondary, support, or off-site features necessary for its implementation.):

Existing Site Conditions and Background Information

The existing 1.61-acre EDCO Recovery and Transfer Station (ER&T) is located at 3660 Dalbergia Street, San Diego, California (Figures 1 to 4). The existing EDCO Recovery and Transfer Station (ER&T) facility has operated since the 1960s, with periodic updates and renovations completed since its opening. Current hours of operation of the ER&T facility are Monday–Saturday from 6:00 a.m. up to 7:00 p.m. Pursuant to the Solid Waste Facility Permit (Permit No. 37-AA-0105), the facility can accept up to 1,500 tons per day of mixed solid waste from a combination of permitted haulers, contractors and public self-haulers. Recyclable materials such as large pieces of concrete, wood, green waste, and drywall are separated from other solid waste. The maximum allowable hold time for non-recyclable solid waste is restricted to 48 hours.

The existing facility is also subject to Coastal Development Permit No. 8488 and Site Development Permit No. 8489 (City Job Order Number 42-0683). Consistent with these permits, the facility currently includes a 29,550-square-foot structure, 31 off-street parking spaces, a maximum of 12 employees, and operation limits from 6:00 a.m. to 7:00 p.m., Monday to Saturday.

Project Purpose

The purpose of the project is to expand and enhance the existing ER&T facility to increase solid waste diversion and thereby support City of San Diego (City) Zero Waste goals identified in the Climate Action Plan. These Zero Waste Goals are to achieve 75 percent waste diversion by 2020, 90 percent waste diversion by 2035, and zero landfilled waste by
2040. In addition, the expansion of the facility would help achieve the following state objectives:

- **Assembly Bill (AB) 939**: Requires each city or county plan to include an implementation schedule that shows: diversion of 25 percent of all solid waste from landfill or transformation facilities by January 1, 1995 through source reduction, recycling, and composting activities; and diversion of 50 percent of all solid waste by January 1, 2000 through source reduction, recycling, and composting activities.

- **AB 32**: The Mandatory Commercial Recycling Measure included in this bill focuses on increased commercial waste diversion as a method to reduce greenhouse gas (GHG) emissions. It is designed to achieve a reduction in GHG emissions of 5 million metric tons of carbon dioxide equivalents. To achieve the measure's objective, an additional 2 to 3 million tons of materials annually will need to be recycled from the commercial sector by the year 2020 and beyond.

- **AB 341**: The Commercial Recycling Requirements mandate that businesses (including public entities) that generate 4 cubic yards or more of commercial solid waste per week and multi-family residential with five units or more arrange for recycling services. Businesses can take one or any combination of the following in order to reuse, recycle, compost, or otherwise divert solid waste from disposal: self-haul, arrange for collection of source-separated recyclables, or subscribe to a recycling service.

- **AB 1826**: This measure requires businesses that generate 8 cubic yards or more of organic waste to start recycling it by April 2016, and also requires that local jurisdictions implement an organic waste recycling program to receive organic waste from businesses and multi-family developments. This measure includes a scaled approach that increases the organic waste recycling requirements for businesses in 2017, 2019, and 2020. This bill is intended to achieve the GHG reduction goals of AB 32.

- **Senate Bill (SB) 1383 Compliance**: The waste sector aspects of SB 1383 ultimately require California to reduce the disposal of organic waste by 75 percent and to recover 20 percent of edible food currently disposed of, by 2025. Achieving these targets is the shared responsibility of the public, industry, local governments, and the state.

In order to address the need for Anaerobic Digesters to meet state waste reduction goals, an Environmental Impact Report (EIR) was prepared for Statewide Anaerobic Digester (AD) Facilities for the Treatment of Municipal Organic Solid Waste by the California Department of Resources Recycling and Recovery (CalRecycle) in June 2011 (referred to as “Statewide AD EIR”; SCH No. 2010042100). This EIR identified potentially significant impacts related to air quality gas (odors, toxic air contaminants, regional criteria pollutants), greenhouse gas, water quality (direct and cumulative), flooding and drainage, noise (direct and cumulative), public services and utilities (fire, wastewater, water, energy), transportation (capacity and hazards), aesthetics (scenic vistas/ resources, character, light and glare, and cumulative), and
hazards and hazardous materials (existing hazard exposure, hazardous materials, and airport hazard exposure). Mitigation framework was included in the EIR to reduce these potential impacts, which generally consisted of the completion of future project-level analysis for these potential issues, compliance with regulations, siting AD facilities in a manner that would avoid certain issues, and the incorporation of project-level features. As shown in the Statewide Anaerobic Digester EIR Analysis table, the project has been reviewed for consistency with the EIR and the relevant mitigation framework has been followed and implemented, as appropriate. This Statewide Anaerobic Digester EIR is incorporated by reference (CEQA Guidelines Section 15150).

Project

A request for a RIGHT-OF-WAY VACATION to vacate the adjacent alley, a SITE DEVELOPMENT PERMIT (SDP) to amend SDP No. 8489, a COASTAL DEVELOPMENT PERMIT (CDP) to amend CDP No. 8488, and a TENTATIVE MAP to allow for the expansion of the existing ER&T facility and increase solid waste diversion to support the City's Zero Waste goals identified in the Climate Action Plan. In addition, the project would require the acquisition of two portions (approximately 155 square feet and 250 square feet) of real property within the dedicated right-of-way located between Una and Vesta Street. To provide the internal reorganization and space for additional equipment, the site would be expanded to include the parcel to the north and the alleyway to the east (Figure 5). Currently the alleyway is within California Department of Transportation (Caltrans) right-of-way. The project includes the vacation of the alley per Municipal Code Section 125.0940 and the acquisition of a portion of the alleyway area. Overall, the project site usable area would be increased from 1.61 to 2.03 acres.

The existing 29,550-square-foot EDCO transfer station facility would be expanded by 31,130 square feet to a total of 60,680 square feet (Table 1; Figure 5). The expansion would include the following: 5,800-square-foot loadout tunnel; a 3,150-square-foot office area; a 4,200-square-foot anaerobic digester area; an 80 square-foot scale house; and an 18,600-square-foot transfer station expansion, which includes approximately 2,000 square feet of floor area intended for bale storage, as well as other floor area intended for processing and load out. The anaerobic digester expansion area would add an additional 4,200 square feet of building to the north of the existing structure with a separate air exchange system. In order to control dust, the existing misting system would be expanded to cover the expanded building, including the loadout areas. In addition, and according to Title 14 Section 17407.4(a), the operator shall take adequate measures to minimize the creation, emission, or accumulation of excessive dust and particulates, and prevent other safety hazards to the public caused by obscured visibility. The operator shall minimize the unnecessary handling of wastes during processing to prevent the creation of excessive dust. Measures to control dust include, but are not limited to: reduced processing, periodic sweeping and cleaning, misting systems or ventilation control. One or more of the following may be an indication that dust is excessive: (1) safety hazards due to obscured visibility; or (2) irritation of the eyes; or (3) hampered breathing; (4) migration of dust off-site. The main structure would be up to 48 feet tall to accommodate the vertically stacked equipment, which would exceed the Zoning Code Section 152.0307e limit of 35 feet and require a deviation.
Table 1
Existing and Proposed ER&T Facility (square feet)

<table>
<thead>
<tr>
<th>Space</th>
<th>Existing Area</th>
<th>Proposed Area</th>
</tr>
</thead>
<tbody>
<tr>
<td>Transfer Station, Tipping and Waste Separation Area, Bale Storage Area, and Processing/Load Out Area</td>
<td>28,850</td>
<td>47,450</td>
</tr>
<tr>
<td>Support Offices</td>
<td>-</td>
<td>3,150</td>
</tr>
<tr>
<td>Loadout Tunnel</td>
<td>-</td>
<td>5,800</td>
</tr>
<tr>
<td>Scale House</td>
<td>590</td>
<td>80</td>
</tr>
<tr>
<td>Anaerobic Digester Facility</td>
<td>-</td>
<td>4,200</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>29,550</strong></td>
<td><strong>60,680</strong></td>
</tr>
</tbody>
</table>

Table 2
Required Deviations

<table>
<thead>
<tr>
<th>Code</th>
<th>Requirement</th>
<th>Requested Deviation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Driveways</td>
<td>SDMC Table 142-05M&lt;br&gt;The driveway width standard is 30 feet at Dalbergia Street and 20 feet at Vesta Street</td>
<td>A 45-foot main driveway on Dalbergia Street and a 35-foot truck entrance on Vesta Street to accommodate large trucks</td>
</tr>
<tr>
<td>Fencing</td>
<td>SDMC Section 142.0310c&lt;br&gt;3-foot side yard height limit</td>
<td>8-foot tall wooden fence along the northern boundary adjacent to the existing commercial use for screening and security</td>
</tr>
<tr>
<td>Building Height</td>
<td>SDMC Section 152.0307e&lt;br&gt;35 feet maximum height</td>
<td>48 feet maximum height to accommodate equipment</td>
</tr>
<tr>
<td>Parking</td>
<td>SDMC Chapter 14 Article 2&lt;br&gt;The site would require 29 off-street parking spaces</td>
<td>Utilize street parking to satisfy the project's parking demand due to site constraints</td>
</tr>
</tbody>
</table>

The project includes improvements to internal circulation and driveways. Currently, the site has three driveways on Dalbergia Street and one alleyway entrance on Vesta Street. More specifically, one driveway exists on Dalbergia Street on the northern parcel proposed to be added to the transfer station site and two driveways exist on Dalbergia Street that provide access to the existing transfer station. The project would consolidate the Dalbergia Street driveways into one main driveway. The proposed main driveway would be located at the northwestern corner of the site and would include three lanes. To accommodate large trucks exiting and provide safe turning radii, this driveway would be 45 feet wide with striped medians separating the lanes. One of the lanes would provide a channelized entrance to the building. A secondary 35-foot-driveway would be located in the southwest corner of the site similar to the existing alleyway location and would only be used by large truck entry. While driveways would require width deviations (refer to Project Approvals Required section below), total driveway entrance widths would be reduced relative to the existing condition and they would be sized to accommodate the turn radius of large trucks. The project would include shaker plates at the main exit to prevent tracking debris onto the adjacent public streets.

The Municipal Code Chapter 14 Article 2 requires 1 parking space per 1,000 square feet of office or industrial uses. Based on the project square footages and the Municipal Code requirements, the site would require 52 parking spaces. The project would provide four
parking spaces on-site, including two zero-emission vehicle and/or carpool spaces, and two Americans with Disabilities Act (ADA) accessible spaces. The project also includes two motorcycle parking spaces. The project would also provide two bicycle racks for three bicycles, three bicycle lockers, and an electric vehicle charging station. The project proposes a deviation to provide parking via existing and proposed spaces along adjacent roadways. This includes an additional 11 spaces created by the proposed consolidation of the project driveways. The parking would be expected to be adequate to satisfy site-specific parking demands (Kimley-Horn 2018).

Currently the site has 620 square feet of landscaping. The project would increase the landscaping on-site to 9,978 square feet. The proposed landscaping would be located along all edges of the site to provide visual screening from the local roadways and the adjacent property. A rosemary hedge would be provided along the building on Dalbergia and Vesta streets with low groundcover between the sidewalk and the roadways. Vine screening (Cat's claw) would also be provided along the building. Evergreen trees with groundcover would be provided along the northern boundary, and trees along Vesta Street would be replaced with flowering Natchez crape myrtle trees.

In addition to the landscape screening, the project proposes to include fencing to screen views and provide site security. This includes an 8-foot-tall wooden fence along the northern boundary adjacent to the existing commercial use, which requires a deviation to exceed the 3-foot side yard height limit identified in Zoning Code Section 142.0310c. A vinyl coated fence with vines is proposed along the eastern project boundary near the freeway. The Vesta Street fence would include a proposed decorative concrete masonry unit screen wall. Portions of the existing fence would remain in place, such as the concrete masonry unit wall along Dalbergia Street.

The project also includes utility improvements. The project would upgrade the storm water system to current standards, with biofilters and runoff controls. Water and sewer line layouts would be modified to accommodate the project layout. In addition, the project would relocate the existing aboveground diesel storage tanks and other electrical equipment. The project would provide compressed natural gas fast-fill dispensers for fleet vehicles and associated equipment. All utility improvements would be located within the project site and would be private.

The ER&T would still operate within the existing permitted capacity of 1,500 tons per day and would continue to receive the same types of mixed solid waste. If the facility meets this tonnage limit, then the facility must discontinue accepting waste for that day. However, additional equipment would be added for mechanized processing and anaerobic digestion to achieve a higher waste diversion rate. In addition, the internal processing hours would be extended to 24 hours per day, and receiving hours would be extended by one hour to 5:00 a.m. to 7:00 p.m., and the facility would be open to receive materials Monday through Sunday. There would be two operational employee shifts from 4:00 a.m. to 1:00 p.m. and 2:00 p.m. to 11:00 p.m. A total of 23 operational employees would be on-site during each shift. In addition, two management employees would be on-site from 5:00 a.m. to 5:00 p.m., for a maximum of 28 total employees on-site at any one time, during
daytime hours. A 60-minute transition period between the 1:00 p.m. and 2:00 p.m. operational staff shifts would minimize overlap in parking demand from the two shifts. While the project would allow for internal processing to occur 24 hours per day, most of the site activity would occur between 5:00 a.m. to 11:00 p.m. However, the project allows for 24-hour operations to provide flexibility in the event staff need to be on-site before the standard 4:00 a.m. shift or after the 11:00 p.m. shift to accommodate surges in inbound tonnage and processing demands. During these nighttime hours, maximum employees on-site would not exceed 23.

The facility expansion and enhancements are anticipated to support the recovery of additional cardboard, mixed paper, mixed rigid plastics, steel, asphalt, concrete, wood, and green waste. Similar to operation of the existing facility, spotters would monitor the tipping and waste separation area for public safety consistent with CCR Title 14 Section 14-17408.8. The facility does not currently handle hazardous wastes nor does the project propose to.

The construction phase of the project would involve demolition of pavement, grading, and construction. Demolition activities would involve approximately 34,000 square feet of hardscape removal. Grading would result in the export of up to 6,000 cubic yards of soils, with cuts extending to a maximum depth of 13.5 feet. The resulting hardscape debris and soil export would be diverted from landfills via a reclaimed aggregate facility and the City of San Diego Clean Fill Dirt Program. Source separation would be completed during construction to maximize landfill diversion as well. The project may be split into three phases; the loadout tunnel/alleyway building improvements, building expansion to the south to accommodate equipment, and AD installation.

9. Surrounding land uses and setting:

The site is bounded by Vesta Street to the southeast, Dalbergia Street to the southwest, an alleyway abutting Interstate 5 (I-5 Freeway) to the northeast, and a commercial/light industrial business to the northwest. The site is designated Residential/Commercial/Industrial and zoned IH-2-1 per the Barrio Logan/Harbor 101 Community Plan Land Use Map. The site is also within Coastal Overlay Zone (Non-appealable Area 2) and Transit Area Overlay Zone. To the northeast of the site lies I-5 Freeway, while the parcels adjacent to the block that the project site is located on (to the north, west, and south) are also designated as Residential/Commercial/Industrial per the Barrio Logan/Harbor 101 Community Plan Land Use Map. Existing land uses located adjacent to the northern portion of the site are commercial/industrial. Existing land uses located adjacent to the western portion of the site include industrial/commercial, and single-family residential. Existing land uses located adjacent to the southern portion of the site consist of single-family residential. In general, the land uses within the vicinity of the project site are best characterized as intermixed residential, commercial, and industrial. In addition, the project site is located in a developed area currently served by existing public services and utilities.
10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

City of San Diego Solid Waste Local Enforcement Agency, Air Pollution Control District, County of San Diego Department of Health, Regional Water Quality Control Board (RWQCB), California Department of Transportation, CalRecycle, San Diego Gas & Electric.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?

In accordance with the requirements of Public Resources Code 21080.3.1, the City of San Diego provided formal notification to the Iipay Nation of Santa Isabel and the Jamul Indian Village, both traditionally and culturally affiliated with the project area, requesting consultation via email on May 16, 2017. Both Native American Tribes responded within the 30-day formal notification period identifying that consultation was not necessary and therefore concluding the consultation process.

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

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

☐ Aesthetics ☐ Greenhouse Gas Emissions ☐ Population/Housing

☐ Agriculture and Forestry Resources ☐ Hazards & Hazardous Materials ☐ Public Services

☒ Air Quality ☐ Hydrology/Water Quality ☐ Recreation

☐ Biological Resources ☐ Land Use/Planning ☐ Transportation/Traffic

☐ Cultural Resources ☐ Mineral Resources ☐ Tribal Cultural Resources

☐ Geology/Soils ☐ Noise ☐ Utilities/Service System

☐ Mandatory Findings Significance

DETERMINATION: (To be completed by Lead Agency)

On the basis of this initial evaluation:

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

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

☐ The proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ The proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect (a) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (b) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required.

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

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact answer should be explained where it is based on project specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis.)

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.

4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses”, as described in (5) below, may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or (mitigated) negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

   a. Earlier Analysis Used. Identify and state where they are available for review.
   b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c. Mitigation Measures. For effects that are “Less Than Significant With Mitigation Measures Incorporated”, describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.

9) The explanation of each issue should identify:

   a. The significance criteria or threshold, if any, used to evaluate each question; and
   b. The mitigation measure identified, if any, to reduce the impact to less than significant.
i. Aesthetics – Would the project:

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

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
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The Barrio Logan/Harbor 101 Community Plan (Map Number 1, Visual Analysis) identifies critical view corridors within the Barrio Logan/Harbor 101 Community Planning area. The project site is not located within or adjacent to any of these noted view corridors. Potential scenic vistas exist from the Coronado Bridge and potentially other areas closer to the bay; however, the project is not within those viewsheds. As such, the redevelopment and expansion of the existing facility would not adversely affect any scenic vistas.

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

<table>
<thead>
<tr>
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<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
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The project site is not within a state scenic highway. The closest state scenic highway is State Route 75 (SR-75), which runs from Imperial Beach along the coast to the Coronado Bridge. The Coronado Bridge and SR-75 are not visible from the project site. In addition, the project would not damage any existing scenic rock outcroppings or historic buildings, as none of these features are located within the boundaries of the project site; furthermore, the project site is already developed with a transfer station.

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
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The project involves the expansion of an existing waste and recycling collection facility. The project site is currently built out, and the parcel to the northwest of the site that would be incorporated into the project which is currently vacant. The additional landscaping and fencing proposed would provide screening of the structures and trucks from adjacent areas. The expansion of the facility would not substantially change the existing visual character of the site, as it is currently in use as a waste and recycling collection facility. The overall visual character and quality of the site would remain the same, and no impact would occur.

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

<table>
<thead>
<tr>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
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Chapter 14 of the City’s Municipal Code, referred to as the Outdoor Lighting Regulations (Ordinance Number 20186), is intended to minimize light pollution, promote lighting design that conserves electrical energy, and provide adequate lighting for public safety. In Section 142.0740, the ordinance defines requirements for outdoor lighting, such as shielding and flat lenses use. Shielding would also minimize nuisance light to neighboring land uses. The project would comply with this ordinance, and shield and direct light downward and away from property line to prevent light spillage onto neighboring properties and the night sky. The project would include security lighting and potentially
include street lighting. As the site is currently developed with lighting and the project would comply with the Municipal Code lighting requirements, the overall change in lighting at the site would be minimal. No new source of substantial light or glare would occur.

II. AGRICULTURAL AND FOREST RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. – Would the project:

a) Converts Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

The project site is developed and does not include any important farmlands. The site is not designated or zoned for agricultural use and is not adjacent to areas zoned for or in agricultural use. Therefore, the project would have no direct or indirect impact to important farmland resources.

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

The project site is not designated or zoned for agricultural use and is not adjacent to areas zoned for or in agricultural use. There project site is not subject to a Williamson Act Contract or adjacent to such lands. Therefore, the project would not conflict with existing zoning for agricultural use or a Williamson Act Contract.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 1220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? 

The project is not within an area designated as forest land, and forest land is not present within the project site or within the vicinity of the project site, as it is located within an urban environment surrounded by existing development as well as I-5 Freeway. Therefore, the project would not conflict with land zoned as forest or timberland.
<table>
<thead>
<tr>
<th>Issue</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>d)</td>
<td>Result in the loss of forest land or conversion of forest land to non-forest use?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
</tbody>
</table>

Refer to II(c), above. The project would not result in the loss of forest land or the conversion of forest land to non-forest use.

e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

Refer to II(c), above. The project would not result in the indirect loss of agricultural or forest land.

III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied on to make the following determinations – Would the project:

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

The following is based on an air quality analysis report prepared by RECON for the EDCO Material Recovery and Transfer Station Facility Expansion, dated July 13, 2018.

The California Clean Air Act (CAA) requires areas that are designated as non-attainment areas for state ambient air quality standards for ozone, carbon monoxide (CO), sulfur dioxide (SO₂), and nitrogen dioxide (NO₂) to prepare and implement plans to attain the standards by the earliest practicable date. The San Diego Air Basin (SDAB) is designated as a non-attainment area for the state ozone standard. Accordingly, the Regional Air Quality Strategy (RAQS) was developed to identify feasible emission control measures and provide expeditious progress toward attaining the state standards for ozone. The two pollutants addressed in the RAQS are reactive organic gases (ROG) and oxides of nitrogen (NOₓ), which are precursors to the formation of ozone. Projected increases in motor vehicle usage, population, and growth create challenges in controlling emissions and, by extension, to maintaining and improving air quality. The RAQS, in conjunction with the Transportation Control Measures (TCM), were most recently adopted in 2016 as the air quality plan for the region and are based on emission information from the California Air Resources Board (CARB), population growth, and vehicle miles traveled (VMT) projections prepared by the San Diego Association of Governments (SANDAG).

SANDAG growth projections are based on land use plans developed by local jurisdictions. As such, projects that propose development that is consistent with the growth anticipated by the local land use plan would be consistent with the SANDAG’s growth projections and the RAQS emissions estimates. In the event that a project would propose development that is less dense than anticipated by the growth projections, the project would likewise be consistent with the RAQS. In the event a project proposes development that is greater than anticipated in the growth projections, further analysis would be warranted to determine if the project would exceed the growth projections used in the RAQS for the specific subregional area.
The project would not change the land use of the existing ER&T facility parcels. The project would increase the size of the site from 1.61 acres to 2.03 acres through the right-of-way vacation and appropriation of the alley to the northeast of the existing ER&T facility and the incorporation of the parcel to the northwest of the existing ER&T facility. Thus, the project would change the land use of the alley to the northeast of the existing ER&T facility and the parcel to the northwest of the existing ER&T facility. The parcel and the alley (which is considered part of the City’s right-of-way) have Residential/Commercial/Industrial land use designations in the Barrio Logan/Harbor 101 Community Plan. As the project would develop industrial uses that are consistent with the land use designation, the project would be consistent with growth anticipated by the City’s General Plan and thus SANDAG’s population growth and VMT projections. As RAQS emissions forecasts are based on land use assumptions from the City General Plan and SANDAG growth projections, the project is also accounted for in the RAQS emissions estimates. Therefore, the project would not obstruct or conflict with implementation of the San Diego RAQS. Impacts related to consistency with the San Diego RAQS would be less than significant.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

- [ ] Yes
- [ ] No
- [x] No
- [ ] N/A

**Construction Emissions**

Construction-related activities are temporary, short-term sources of air emissions, and include fugitive dust from grading activities, construction equipment exhaust, and construction-related trips by workers and material-hauling trucks. Fugitive dust emissions generally occur during demolition and grading, and are highly dependent on the weather, content of the soil, and the duration/type of grading activity. Construction equipment and construction-related trips generate diesel emissions, which contain more NOX, oxides of sulfur (SOX), and particulate matter (PM) than gasoline-powered equipment.

RECON prepared an air quality analysis (RECON 2018) to determine the construction emissions generated by the project. The analysis assumed the worst-case construction emission scenario, in which the entire building is demolished and rebuilt. As shown in Table 3, air emissions associated with project construction would not exceed the City’s thresholds of significance. Therefore, project construction would not result in regional emissions that would exceed the National Ambient Air Quality Standards or California Ambient Air Quality Standards or contribute to existing violations. Construction-related air quality impacts would be less than significant.

<table>
<thead>
<tr>
<th></th>
<th>ROG</th>
<th>NOX</th>
<th>CO</th>
<th>SOX</th>
<th>PM10</th>
<th>PM2.5</th>
</tr>
</thead>
<tbody>
<tr>
<td>2018</td>
<td>66</td>
<td>64</td>
<td>20</td>
<td>&gt;1</td>
<td>10</td>
<td>5</td>
</tr>
<tr>
<td>2019</td>
<td>66</td>
<td>2</td>
<td>2</td>
<td>&gt;1</td>
<td>&gt;1</td>
<td>&gt;1</td>
</tr>
<tr>
<td><strong>Maximum Daily Emissions</strong></td>
<td><strong>66</strong></td>
<td><strong>64</strong></td>
<td><strong>20</strong></td>
<td><strong>&gt;1</strong></td>
<td><strong>10</strong></td>
<td><strong>5</strong></td>
</tr>
</tbody>
</table>

**Table 3**

Summary of Worst-case Construction Emissions (pounds per day)

**SOURCE:** RECON 2018
Operational Emissions
Operational emissions are long term and include mobile and area sources, including traffic emissions generated by the project, natural gas emissions used for heating, consumer products, architectural coatings, landscaping equipment, dust from waste material movement, and emissions from operation of the anaerobic digester facility as well as subsequent emissions from the generation of electricity and fueling of waste collection vehicles.

An analysis was conducted to determine the operational emissions generated by the project, which included two operational emissions assessments. The first assessment analyzes operational emissions while disregarding those emissions associated with the anaerobic digester facility. As shown in Table 4, these emissions would not exceed the City's threshold of significance for operational emissions.

<table>
<thead>
<tr>
<th>Source</th>
<th>ROG</th>
<th>NO\textsubscript{X}</th>
<th>CO</th>
<th>SO\textsubscript{X}</th>
<th>PM\textsubscript{10}</th>
<th>PM\textsubscript{2.5}</th>
</tr>
</thead>
<tbody>
<tr>
<td>Area Sources</td>
<td>1</td>
<td>&gt;1</td>
<td>&gt;1</td>
<td>&gt;1</td>
<td>&gt;1</td>
<td>&gt;1</td>
</tr>
<tr>
<td>Energy Sources</td>
<td>&gt;1</td>
<td>&gt;1</td>
<td>&gt;1</td>
<td>&gt;1</td>
<td>&gt;1</td>
<td>&gt;1</td>
</tr>
<tr>
<td>Mobile Sources</td>
<td>&gt;1</td>
<td>1</td>
<td>3</td>
<td>&gt;1</td>
<td>1</td>
<td>&gt;1</td>
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<tr>
<td><strong>Total</strong></td>
<td>2</td>
<td>1</td>
<td>3</td>
<td>&gt;1</td>
<td>1</td>
<td>&gt;1</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Significance Threshold</th>
<th>250</th>
<th>250</th>
<th>550</th>
<th>250</th>
<th>100</th>
<th>67</th>
</tr>
</thead>
<tbody>
<tr>
<td>Exceeds Threshold?</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
</tbody>
</table>

**Table 4**

Project Operational Emissions without Anaerobic Digester Facility
(pounds per day)

The second assessment addressed operational emissions generated by the proposed anaerobic digester facility, which would become an area source of emissions. The associated emissions from the anaerobic digester facility would vary depending on whether natural gas from the anaerobic digester facility was used to produce electricity or to produce compressed natural gas for waste collection vehicles. The average throughput of the anaerobic digester facility is anticipated to be between 100 and 200 tons of organic waste per day. This analysis assesses maximum daily emissions associated with 200 tons of organic waste per day. Table 5 summarizes daily anaerobic digester facility emissions that would occur under each scenario as well as the total project operational emissions under each scenario.
### Table 5

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emissions by Biogas Use¹</th>
<th>Total Emissions²</th>
<th>Significance Thresholds</th>
<th>Exceeds?</th>
</tr>
</thead>
<tbody>
<tr>
<td>ROG</td>
<td>Electricity 35 (Electricity 37) Vehicle-Fuel 15</td>
<td>Electricity 37 Vehicle-Fuel 17</td>
<td>250</td>
<td>No/No</td>
</tr>
<tr>
<td>NOₓ</td>
<td>Electricity 136 (Electricity 137) Vehicle-Fuel 11</td>
<td>Electricity 12 Vehicle-Fuel 12</td>
<td>250</td>
<td>No/No</td>
</tr>
<tr>
<td>CO</td>
<td>Electricity 309 (Electricity 311) Vehicle-Fuel 32</td>
<td>Electricity 34 Vehicle-Fuel 5</td>
<td>550</td>
<td>No/No</td>
</tr>
<tr>
<td>SOₓ</td>
<td>Electricity 77 (Electricity 77) Vehicle-Fuel 5</td>
<td>Electricity 5 Vehicle-Fuel 5</td>
<td>250</td>
<td>No/No</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>0 (Electricity 1) Vehicle-Fuel 1</td>
<td>1 (Electricity 1) Vehicle-Fuel 1</td>
<td>100</td>
<td>No/No</td>
</tr>
<tr>
<td>PM₂₅</td>
<td>0 (Electricity 1) Vehicle-Fuel 1</td>
<td>1 (Electricity 1) Vehicle-Fuel 1</td>
<td>67</td>
<td>No/No</td>
</tr>
</tbody>
</table>

**SOURCE:** RECON 2018  
¹ Reported emissions assume 200 tons per day of material is processed by anaerobic digester facility.  
² Emissions from biogas use were added to project operational emissions without anaerobic digester facility (see Table 7).  
³ Report gives PM values. Conservatively assumed all PM is PM₂₅.  
ROG = reactive organic gas; NOₓ = oxides of nitrogen; CO = carbon monoxide; SOₓ = oxides of sulfur; PM₁₀ = 10-micron particulate matter; PM₂₅ = 10-micron particulate matter

As shown in Table 5, regardless of whether natural gas produced by the anaerobic digester facility would be used to generate electricity or fuel waste collection vehicles, project emissions would be less than the applicable significance thresholds for all criteria pollutants, resulting in a less than significant impact.

c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

The region is classified as attainment for all criterion pollutants except ozone, PM₁₀, and PM₂₅. Ozone is not emitted directly but is a result of atmospheric activity on precursors, NOₓ and ROG. These compounds react in the presence of sunlight to produce ozone. The majority of sources of PM₁₀ and PM₂₅ emissions include crushing or grinding operations, dust stirred up by vehicle traffic, and combustion sources such as motor vehicles, power plants, wood burning, forest fires, agricultural burning, and industrial processes.

As discussed above under Section III(b), emissions of ozone precursors (ROG and NOₓ), PM₁₀ and PM₂₅ from construction and operation would be below the City's thresholds of significance. Therefore, the project would not result in a cumulatively considerable net increase in emissions of ozone, PM₁₀, or PM₂₅. Impacts would be less than significant.

d) Expose sensitive receptors to substantial pollutant concentrations?

The term “sensitive receptor” refers to a person in the population who is more susceptible to health effects due to exposure to an air contaminant than the population at large or to a land use that may
reasonably be associated with such a person. Examples include residences, schools, childcare centers, retirement homes, long-term health care facilities, and outdoor recreation areas, such as athletic fields.

Sensitive receptors in the project vicinity include 3657 Dalbergia Street and 2004 Vesta Street immediately south across Dalbergia Street, and 3704 Dalbergia Street and 1929 Vesta Street immediately southeast across Vesta Street. Various other single- and multi-family residences are also intermixed throughout the neighborhood or located across I-5 Freeway.

**Sensitive Land Uses**
CARB guidelines indicate that siting new sensitive land uses within 500 feet of a freeway or urban roads with 100,000 or more vehicles per day should be avoided when possible. The project does not propose sensitive uses, and therefore would result in no impact.

**CO Hot Spots**
A CO hot spot is a localized area where carbon monoxide (CO) standards are exceeded. CO hot spots typically occur as a result of severe vehicle congestion at signalized intersections of major roadways. A project may result in or contribute to a CO hotspot if it increases traffic volumes significantly over existing volumes (5 percent or more) or worsens traffic flow. The project would generate approximately 158 average daily trips due to the increase in employees. As this increase would not result in an increase in volumes by 5 percent, localized air quality impacts from CO hotspots would be less than significant.

**Construction-related Diesel Particulate Matter**
Construction of the project is expected to occur over a 13-month period and would result in the generation of diesel-exhaust Diesel Particulate Matter (DPM) emissions from the use of off-road diesel equipment required for site grading and excavation, paving, and other construction activities and on-road diesel equipment used to bring materials to and from the project site.

According to the Office of Environmental Health Hazard Assessment (OEHHA), health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 30-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the project (OEHHA 2015). Thus, if the duration of proposed construction activities near any specific sensitive receptor were 13 months, the exposure would be 3 to 4 percent of the total exposure period used for health risk calculation. Therefore, DPM generated by project construction is not expected to create conditions that expose sensitive receptors to substantial pollutant concentration over an extended period of time. Additionally, with ongoing implementation of U.S. Environmental Protection Agency and CARB requirements for cleaner fuels; off-road diesel engine retrofits; and new, low-emission diesel engine types, the DPM emissions of individual equipment would be substantially reduced. Localized air quality impacts from construction-related DPM emissions would be less than significant.

**Operations-related Diesel Particulate Matter**
Vehicles emit diesel particulates through the combustion of diesel fuel. During operation, heavy trucks delivering waste would be diesel fueled. The project would not result in increased daily diesel
truck traffic as compared to the existing ER&T facility, as the daily tonnage capacity would not change. Therefore, the project would not result in an increase of DPM emissions. Project operation would not expose sensitive receptors to substantial pollutant concentration. Localized air quality impacts from operation-related DPM emissions would be less than significant.

e) Create objectionable odors affecting a substantial number of people?

While the project, in its current state, typically generates odors due to the nature of the activity associated with a waste collection and transfer station, the project would not alter existing odor control practices implemented at the ER&T facility. As odors associated with materials tipping and separation are already associated with the ER&T facility and the project would not alter existing waste odor control practices implemented at the ER&T facility, the expansion of the ER&T building is not anticipated to result in additional odors that affect a substantial number of people.

The project includes the addition of an anaerobic digester facility. The anaerobic digester process involves the decomposition of food waste, green waste, and other organic materials in anaerobic conditions. Whereas the hold time for the other waste streams would be limited to 48 hours, organic waste processed at the anaerobic digester facility would remain on-site for approximately 21 days. The anaerobic digester process generates numerous potent odorants during the decomposition of organics. Primary odorants of concern include ammonia (NH₃) and hydrogen sulfide (H₂S). Without odor mitigation and adherence to regulations, the project may generate objectionable odors. Consequently, mitigation measures (AIR-1 and AIR-2) would be required to reduce objectionable odors associated with the ER&T facility operations. Furthermore, the project would be subject to random monthly LEA inspections for odor and nuisance control (14 CCR 17896.32).

A Mitigation Monitoring Reporting Program (MMRP), as detailed in Section V of the Mitigated Negative Declaration would be implemented. With implementation of the MMRP, potential air quality impacts (odors) would be reduced to below a level of significance.

IV. BIOLOGICAL RESOURCES – Would the project:

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

The project site does not contain any sensitive riparian habitat or other identified habitat community. The site is within an urban area and contains existing development. Furthermore, the project site is not within any conserved vegetation community, as identified in the City of San Diego Multiple Species Conservation Program (MSCP). As such, the project would not impact any special status species.
### Issue

<table>
<thead>
<tr>
<th>Issue</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>b) Have a substantial adverse effect on any riparian habitat or other community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
</tbody>
</table>

The site is currently developed and includes buildings, hardscape, and landscaping. No riparian habitat or other natural community exists on-site. No impact would occur.

c) Have a substantial adverse effect on federally protected wetlands as defined by section 404 of the Clean Water Act (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | ☐                               | ☐                                             | ☐                            | ☒         |

The site is currently developed and includes buildings, hardscape, and landscaping. No federally protected waters as defined by the Clean Water Act exist on-site. No impact would occur.

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

The project site is currently developed and includes buildings, hardscape, and landscaping. There are no areas within the project site that may be used as a wildlife corridor for any native resident wildlife species and since the site is already built out, construction and operation of the project would not interfere with the movement of any native resident or migratory fish. The site is not used as a native wildlife nursery and is not located adjacent to or near any native wildlife nursery. No impact would occur.

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

The project site does not contain any biological resources and is not within a Multi-Habitat Planning Area (MHPA) as designated under the City of San Diego MSCP Subarea Plan (City of San Diego 1997). The project would not conflict with any local policies addressing biological resources. No impact would occur.
<table>
<thead>
<tr>
<th>Issue</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
</tr>
</tbody>
</table>

The project site is not within a MHPA as designated under the City of San Diego MSCP Subarea Plan (City of San Diego 1997) and would not conflict with the City's MSCP. No impact would occur.

V. CULTURAL RESOURCES – Would the project:

a) Cause a substantial adverse change in the significance of an historical resource as defined in §15064.5? | ☐ | ☐ | ☐ | ☒ |

The purpose and intent of the Historical Resources Regulations of the Land Development Code (Chapter 14, Division 3, and Article 2) is to protect, preserve and, where damaged, restore the historical resources of San Diego. The regulations apply to all proposed development within the City when historical resources are present. Before approving discretionary projects, California Environmental Quality Act (CEQA) requires the lead agency to identify and examine the significant adverse environmental effects that may result from that project. A project that may cause a substantial adverse change in the significance of a historical resource may have a significant effect on the environment (Sections 15064.5(b) and 21084.1). A substantial adverse change is defined as demolition, destruction, relocation, or alteration activities, which would impair historical significance (Sections 15064.5(b)(1)). Any historical resource listed, or eligible to be listed, in the California Register of Historical Resources is considered to be historically or culturally significant.

One building currently exists on-site. This building was constructed between 2000 and 2001. As this structure is less than 45 years old, the structure is not considered a potential historic resource. Thus, no impact to historic resources would occur.

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

The project site is located within a high sensitivity area on the City of San Diego’s Historical Resources Sensitivity map. Therefore, a record search of the California Historic Resources Information System (CHRIS) digital database was reviewed to determine presence or absence of potential resources within the project site by qualified archaeological City staff. Historic resources were not identified within or adjacent to the project site. The project site was previously graded to allow for the existing development. Therefore, it was determined that there is no potential to impact archaeological resources.
<table>
<thead>
<tr>
<th>Issue</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>c)</td>
<td>Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?</td>
<td>[ ]</td>
<td>[ ]</td>
<td>☒</td>
</tr>
</tbody>
</table>

Based on a geotechnical investigation prepared by GEOCON, Inc. (GEOCON 2016), the project site is underlain by undocumented fill, previously placed compacted fill, alluvium soil, and Old Paralic Deposits (previously known as the Bay Point Formation). The Old Paralic Deposits underlie the Alluvium Soil, which underlies the previously placed and undocumented fill. The Old Paralic Deposits have a high resource sensitivity rating for paleontological resources, while the remaining soils have low to no paleontological sensitivity. According to the geotechnical investigation, the Old Paralic Deposits occur at depths of 25 feet or greater. The project proposes grading up to 6,000 cubic yards of cut, to a maximum depth of 13.5 feet. As grading would only affect fill and alluvium, impacts to paleontological resources would be less than significant.

d) Disturb and human remains, including those interred outside of dedicated cemeteries?

No cemeteries, formal or informal, have been identified on or adjacent to the project site. While there is a very low possibility of encountering human remains during subsequent project construction activities, it is noted that activities would be required to comply with state regulations that are intended to preclude impacts to human remains. Per CEQA Section 15064.5(e), the California Public Resources Code (Section 5097.98) and State Health and Safety Code (Section 7050.5), if human remains are discovered during construction, work would be required to halt in that area and no soil would be exported off-site until a determination could be made regarding the provenance of the human remains via the County Coroner and other authorities as required. Thus, impacts would be less than significant.

VI. GEOLOGY AND SOILS – Would the project:

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

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

Based upon a geotechnical investigation prepared by GEOCON, Inc. dated September 7, 2016, the project site is not located on any known active, potentially active, or inactive fault zone, as identified by the California Geologic Survey. The closest active faults are the Rose Canyon Fault zone and Newport-Inglewood Fault, located approximately 3 miles west of the site. While the project site, as well as most of Southern California, would be subject to seismic ground shaking from the active faults within the region, the project would utilize proper engineering design and standard
<table>
<thead>
<tr>
<th>Issue</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
</tr>
</thead>
</table>

construction practices consistent with California Building Code requirements which reduce impacts to people or structures due to local seismic events to an acceptable level of risk. Therefore, impacts would remain less than significant.

   ii) Strong seismic ground shaking?

There are six active faults within a 50-mile radius of the project site. The closest fault zones, the Rose Canyon Fault and Newport–Inglewood Fault, are located approximately 3 miles west of the site. These faults are the dominant source of potential seismic ground shaking. The Newport–Inglewood Fault is estimated to be able to produce a maximum earthquake magnitude of 7.5 Mw, with a peak ground acceleration of 0.47 g. The Rose Canyon Fault is estimated to be able to produce a maximum earthquake magnitude of 6.9 Mw, with a peak ground acceleration of 0.42 g. The Coronado Bank Fault and Palos Verdes Connected Fault are located 13 miles from the site, while the Elsinore Fault is located 41 miles from the site, and the Earthquake Valley Fault is located 46 miles from the site (GEOCON 2016).

While the project site, as well as most of Southern California, would be subject to seismic ground shaking from the active faults within the region, the project would utilize proper engineering design and standard construction practices in accordance with the California Building Code which reduce impacts to people or structures due to local seismic events to an acceptable level of risk. Therefore, impacts would remain less than significant.

   iii) Seismic-related ground failure, including liquefaction?

Liquefaction typically occurs when a site is located in a zone with seismic activity, on-site soils are cohesionless, groundwater is encountered within 50 feet of the surface, and soil relative densities are less than about 70 percent. If all four criteria are met, a seismic event could result in seismic-related ground failure. Seismically induced settlement is settlement that may occur whether the potential for liquefaction exists or not.

The potential for liquefaction and seismically induced settlement occurring within the site soils is considered to be “low” due to the geologic conditions encountered. Specifically, the alluvial materials exposed between approximately 5 to 25 feet below the ground surface consist of stiff clay, and the Old Paralic Deposits exposed beneath the clay exhibited relative densities that are not conducive to liquefaction. In addition, even if the Old Paralic Deposits exhibited liquefaction, the 25 feet of clay and compacted fill above the groundwater table would prevent any surface manifestation from occurring (GEOCON 2016). While the project site, as well as most of Southern California, would be subject to seismic ground shaking from the active faults within the region, the project would utilize proper engineering design and standard construction practices in accordance with the California Building Code guidelines which reduce impacts to people or structures to an acceptable level of risk. Therefore, impacts would be less than significant.
There is no evidence of any past landslide deposits within the project site or vicinity. The topography of the site and surrounding area is relatively flat. As such, the probability of the project site being subject to landslides is minimal.

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

The project would involve grading activities during the construction phase within the existing site boundaries. Such activities have the potential to cause erosion and the downstream transport of sediment. However, these potential impacts would be addressed through conformance with applicable requirements under the California General National Pollutant Discharge Elimination System (NPDES) permit for storm water discharges. This requirement typically involves the preparation and implementation of an approved Storm Water Pollution Prevention Plan (SWPPP), which includes erosion and sediment control best management practices (BMPs), such as from the Storm Water Standards Manual. Based on the implementation of appropriate erosion and sediment control measures as part of an approved SWPPP under the NPDES Construction General Permit, potential impacts related to erosion and sedimentation hazards from the project would be less than significant.

In addition, a Storm Water Quality Management Plan (SWQMP) has been prepared for the project that identifies pollutants that are anticipated to be generated from the project site based on the proposed land use (Hacunda Consulting 2018). Sediment is not a pollutant of concern under the SWQMP due to the inclusion of hardscape and landscaping; therefore, the operation of the project would not result in substantial soil erosion or the loss of topsoil.

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

Refer to VI(a)(i) and VI(a)(iii).

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

The soils encountered within the project site consist of undocumented fill, previously placed compacted fill, alluvium soils, and Old Paralic Deposits. These soils that exist within the project site are considered to be “expansive” as defined by 2013 California Building Code Section 1803.5.3. Based on the Expansion Index (EI), which provides an indication of the swelling potential of a compacted soil, the materials collected and tested for the Expansion Index rating indicate a “medium” expansion potential (expansion index of 90 or less) (GEOCON 2016). The project grading
and construction activities would be conditioned to adhere to a final geotechnical investigation to be prepared pursuant to the California Building Code and City standards. While the project site is located on expansive soils, the project would utilize proper engineering design and standard construction practices in accordance with the applicable California Building Code guidelines which reduce impacts to people or structures to an acceptable level of risk. Therefore, impacts would be less than significant.

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

The project does not propose any septic tank or alternative waste water disposal systems and is located within the wastewater service area for the City of San Diego Metropolitan Sewerage System and Wastewater Branch of the City of San Diego Public Utilities Department.

VII. GREENHOUSE GAS EMISSIONS – Would the project:

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

Climate Action Plan

The City adopted the Climate Action Plan (CAP) in December 2015 (City of San Diego 2015). With implementation of the CAP, the City aims to reduce emissions 15 percent below the baseline to approximately 11.1 million metric tons of carbon dioxide equivalent (MMT CO2E) by 2020, 40 percent below the baseline to approximately 7.8 MMT CO2E by 2030, and 5 percent below the baseline to approximately 6.5 MMT CO2E by 2035. The City has identified the following five CAP strategies to reduce GHG emissions to achieve the 2020 and 2035 targets: (1) energy- and water-efficient buildings; (2) clean and renewable energy; (3) bicycling, walking, transit, and land use; (4) zero waste (gas and waste management); and (5) climate resiliency. The City’s CAP Consistency Checklist, adopted July 12, 2016, is the primary document used by the City to ensure project-by-project consistency with the underlying assumptions in the CAP and thereby to ensure that the City would achieve the emission reduction targets identified in its CAP.

CAP Consistency Checklist

The CAP Consistency Checklist is the City’s significance threshold utilized to ensure project-by-project consistency with the underlying assumptions in the CAP and to ensure that the City would achieve its emission reduction targets identified in the CAP. The CAP Consistency Checklist includes a three-step process to determine project if the project would result in a GHG impact. Step 1 consists of an evaluation to determine the project’s consistency with existing General Plan, Community Plan, and zoning designations for the site. Step 2 consists of an evaluation of the project’s design features compliance with the CAP strategies. Step 3 is only applicable if a project is
not consistent with the land use and/or zone, but is also in a transit priority area to allow for more intensive development than assumed in the CAP.

Under Step 1 of the CAP Checklist, the project is consistent with the existing General Plan, Community Plan designations as well as zoning for the site. Therefore, the project is consistent with the growth projections and land use assumptions used in the CAP. Furthermore, completion of Step 2 of the CAP Checklist demonstrates that the project would be consistent with applicable strategies and actions for reducing GHG emissions. This includes project features consistent with the energy and water efficient buildings strategy, as well as bicycling, walking, transit, and land use strategy. Thus, the project is consistent with the CAP. Step 3 of the CAP Consistency Checklist would not be applicable, as the project is not proposing a land use amendment or a rezone.

Based on the project's consistency with the City's CAP Checklist, the project's contribution of GHGs to cumulative statewide emissions would be less than cumulatively considerable. Therefore, the project's direct and cumulative GHG emissions would have a less than significant impact on the environment.

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

Refer to VII(a).

VIII. HAZARDS AND HAZARDOUS MATERIALS - Would the project:

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

Construction activities would likely require use of limited quantities of hazardous materials such as fuels for construction equipment, oils, and lubricants. The improper use, storage, handling, transport, or disposal of hazardous materials could result in accidental release of hazardous materials, thereby exposing construction workers, the public, and the environment, including soil and/or ground or surface water, to hazardous materials contamination. The facility's Solid Waste Facility Permit (Permit No. 37-AA-0105) prohibits a facility from accepting hazardous wastes, thus, demolition debris is not anticipated to include materials contaminated with hazardous waste residue (e.g. fuels, oils, etc.). In the event contaminated debris is encountered, it would be handled using best management practices for the minimization of any hazards that may arise through the transport, use, or disposal.

The facility would operate under a Solid Waste Facility Permit that prohibits a facility from accepting hazardous wastes. The project would be subject to random monthly LEA inspections to prevent acceptance of hazardous waste (14 CCR 17896.23 and 17896.25). Nonetheless, it is anticipated that such a facility may receive such wastes through the waste stream. The operator of the facility must keep a record of the quantities and types of hazardous materials that is discovered through the load
check program. The project includes a compressed natural gas dispensers and diesel tank relocation. The facility would be required to operate within the requirements and conditions set forth in the Solid Waste Facility Permit (SWFP). Additionally, the facility would be required to operate within the requirements and conditions set forth in hazardous material permits, minimizing any hazards that may arise through the transport, use, or disposal of hazardous materials.

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

The project involves typical construction activities, which may involve the use of lubricating oils, paints, solvents, and other materials. In addition, the project includes diesel storage tanks and compressed natural gas usage. Project activities would be completed in compliance with regulations, including the proper use, transport, and disposal of hazardous materials. The project would comply with the County Department of Environmental Health requirements, including the requirement to prepare and comply with a Hazardous Materials Business Plan. As in the facility’s existing setting, the site would continue to operate as a Transfer Station and Material Recovery Facility (MRF). Hazardous materials would continue to be excluded from the waste stream; but would continue to be discovered through the load check program and then be handled. The use of regulated hazardous materials in routine operations and maintenance of the site and fleet vehicles is an existing condition that would continue upon approval of the project. While hazardous wastes such as oil or batteries occasionally enter the site as part of the waste load check process, the handling, temporary storage, and disposal procedures that are currently in place pursuant to an approved Hazardous Materials Business Plan would continue to be implemented by the project. In addition, the facility would operate under a Solid Waste Facility Permit (Permit #37-AA-0105), with which the facility would be required to comply. Compliance with this permit would ensure potential hazardous material use impacts of the project would be below a level of significance.

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

The nearest school to the project site is Balboa Elementary School, which is approximately 0.3 mile east of the project site (across I-5 Freeway). The project is not within one-quarter mile of a school, daycare, hospital, or other land use.
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<td>Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?</td>
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According to the California Department of Toxic Substances Control EnviroStor Database, the project site does not contain any sites listed that contain hazardous materials that have been compiled pursuant to Government Code Section 65962.5.

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

☐ ☐ ☐ ☒

The closest airport to the project site is the San Diego International Airport (SDIA), approximately 5 miles north of the site. An Airport Land Use Compatibility Plan (ALUCP) has been prepared for the SDIA, and the project site is not located within the boundaries of the designated Airport Influence Area (SDIA ALUCP Exhibit 1-1 Airport Influence Area; April 2014).

The Naval Air Station North Island airport, located on the Coronado peninsula, does not have an adopted ALUCP (City of San Diego General Plan). However, the Navy has produced a Final Air Installations Compatible Use Zone (AICUZ) update (2011) for this facility. The AICUZ establishes Accident Potential Zones (APZs), which are areas that military aircraft routinely over fly that have higher potential for an aircraft accident or crash to occur. The project site is not located within an APZ for the Naval Air Station North Island air field (City of San Diego General Plan Figure 3.5-5; San Diego General Plan 2008).

The use and density are considered consistent with the ALUCP and would not result in a safety hazard for people residing or working in the area. Impacts would be less than significant.

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

☐ ☐ ☐ ☒

The project site is not within the vicinity of a private use airstrip. No impact would occur.

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

☐ ☐ ☐ ☒

The project does not include any off-site changes to the existing roadways and would not impact access through the area. Therefore, the project would not impair or interfere with an adopted emergency response plan or emergency evacuation plan.
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

The project site is not adjacent to any wildland areas. The site and surrounding areas are highly urbanized and contains existing development. According to Figure PF-9 of the City of San Diego General Plan, the project site is not adjacent to a High Fire Risk Area (San Diego General Plan 2008a). Therefore, the project would not subject people or structures to a significant risk of being exposed to wildfires.

IX. HYDROLOGY AND WATER QUALITY - Would the project:

a) Violate any water quality standards or waste discharge requirements?

Potential impacts to existing water quality standards associated with the project would include minimal short-term construction-related erosion/sedimentation and no long term operational storm water discharge. According to the City's Storm Water Requirements Applicability Checklist, the project is considered to be a Priority Development Project and therefore required to prepare a Storm Water Quality Management Plan (Hacunda 2018) to identify and implement required best management practices (BMPs) for storm water pollutant control (BMP Design Manual Chapter 5, Part 1 of Storm Water Standards). The BMPs to be included in the project per the SWQMP (Hacunda 2018) consist of rainwater collection and on-site use of filtered rainwater, and modular wetlands. These requirements would be implemented during construction and post-construction, which have been reviewed by qualified staff and would be re-verified during the ministerial process. Adherence with the standards would ensure that water quality standards are not violated and also preclude a cumulatively considerable contribution to water quality; therefore, a less than significant impact would result.

b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

The project does not require the use of groundwater, nor would it create substantial new impervious surfaces that would interfere with groundwater recharge.
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<td>c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site?</td>
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A hydrology report (Hacunda 2017) was prepared to address drainage impacts for the project. The following analysis is based on the report.

#### Existing Drainage

The majority of the site surface drains to an existing catch basin located in the middle of the existing alley located between the existing facility and the small hillside (Caltrans slope) that buffers the property from I-5. The catch basin is drained by an existing 15-inch concrete pipe that flows under the I-5 Freeway in a northerly direction until it reaches an existing 36-inch concrete pipe in Birch Street. That line proceeds in a northerly direction discharging into Chollas Creek and eventually into the San Diego Bay. The total drainage basin area for Chollas Creek is approximately 2 acres.

A small amount of the site drains to the west, discharging over the surface onto Dalbergia Street. The drainage then proceeds in curb and gutters and cross-gutters, southerly and westerly on Woden Street and Main Street before sheet flowing across the intersection of Main Street and Yama Street and into Paleta Creek. Paleta Creek is an earth channel that traverses the Navy facility eventually reaching the San Diego Bay. The total drainage basin area for Paleta Creek is approximately 0.45 acre.

#### Proposed Drainage

It is proposed to intercept the majority of the off-site Caltrans slope with a concrete v-ditch along the project's easterly boundary and divert the majority of the flow south to Vesta Street. A small amount of the Caltrans slope would be intercepted by a concrete v-ditch and diverted north to Una Street. To compensate for this minor diversion to the Paleta Creek watershed, the project would redirect a portion of existing flows to Chollas Creek Basin.

The project drainage has been reviewed by City Engineers against City standards. Overall, the project would comply with City regulations relative to drainage. The Caltrans slope runoff would be re-directed to the City streets (Una and Vesta) without impacting downstream facilities (Hacunda 2017). Thus, impacts would be less than significant.

d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or off-site? ☐ ☐ ☒ ☐ ☐

Refer to XI(c).
e) Create or contribute runoff water, which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

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Refer to XI(c).

f) Otherwise substantially degrade water quality?

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Refer to XI(c).

g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

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The project does not involve the construction of new or the redevelopment of housing. In addition, the project site is not within a designated Federal Emergency Management Agency (FEMA) Floodplain or Floodway, per the most recent FEMA Flood Insurance Rate Map (FIRM) 06073C1911G, effective May 16, 2012.

h) Place within a 100-year flood hazard area, structures that would impede or redirect flood flows?

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Refer to XI(g). The project is not within a flood hazard area and would not place structures within a 100-year flood hazard area.

X. LAND USE AND PLANNING – Would the project:

a) Physically divide an established community?

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The site is already developed, and the proposed facility expansion would not divide the established Barrio Logan community. The site is designated for Residential/Commercial/Industrial land use and is identified as Industrial in the Barrio Logan/Harbor 101 Community Plan. The site is zoned within Subdistrict B on the Barrio Logan Planned District (City 2008b) within the Barrio Logan/Harbor 101 Community Plan area. Subdistrict B allows nonresidential uses permitted in the IH-2-1 zone, which allows for large/small recycling/collection facilities.

The facility would be consistent with this designation, and the zoning code allows for a transfer station as a conditional use. No impact would occur.
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

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The project site is within the Multi-Use Land Use Designation as designated by the City of San Diego General Plan. The project site is within the Residential/Commercial/Industrial Land Use Designation as designated by the Barrio Logan/Harbor 101 Community Plan. The Barrio Logan Zoning Map designates the site as “Subdistrict B,” which allows for land uses permitted under the IH-2-1 Zone in the Barrio Logan/Harbor 101 Community Plan. The IH-2-1 zone allows for recycling facility uses, specifically large or small collection facilities with limitations, which may include location limitations or the requirement for a use or development permit. The entire community of Barrio Logan is within the Coastal Zone and is therefore subject to the regulations under the 1976 California Coastal Act. The Coastal Zone Element discusses how the Community Plan is consistent with the requirements of the Coastal Act. The land uses for the Barrio Logan community are consistent with the requirements of the Coastal Act. The land use of the site would not change with the implementation of the project, and therefore does not conflict with any applicable land use plan, policy, or regulation.

The project is requesting various allowable deviations from the development regulations that pertain to driveways, fencing, building height, and parking requirements.

Per the Zoning Code Table 142-05M, the driveway width standard is 30 feet at Dalbergia Street and 20 feet at Vesta Street. The project proposes a 45-foot main driveway on Dalbergia Street and a 35-foot truck entrance on Vesta Street. The increased driveway widths are needed to accommodate large truck turning radii, accommodate site constraints, and provide safer internal and external traffic conditions. The 53-foot transfer trucks currently utilizing the site require a larger turning radius than a typical vehicle, which results in the need to wider driveways. The site constraints that also limit the ability to reduce driveways are related to the need to provide storm water improvements along the eastern perimeter, accommodate existing and proposed parking, and accommodate internal circulation with the expanded structure pursuant to SB 341. The project would reduce the total driveways from 92 linear feet to 80 linear feet, which is a 12-foot reduction in total driveway linear feet. The consolidated driveway on Dalbergia Street would move driveways further from intersections and reduce the potential conflicts between turning movements and through traffic. The widening of the Vesta Street alleyway access to a full driveway would also avoid the need for large trucks to drive over sidewalk areas. Overall, the proposed driveway deviations would not result in a significant environmental impact.

The project also includes a deviation for the proposed solid wood 8-foot-tall fence along the northern property boundary and the 48-foot height of the proposed structure. These two deviations would have environmental effects limited to aesthetics. The intent of this fence is to screen views of the site and improve safety in accordance with the San Diego Police Department request. The proposed building height would not block any scenic vistas, alter the site character, or otherwise...
result in a negative aesthetic (see Section I, Aesthetics, above). These deviations would not result in any additional environmental impacts.

The Municipal Code Chapter 14 Article 2 requires 1 parking space per 1,000 square feet of office or industrial uses. Based on the project square footages and the Municipal Code requirements, the site would require 52 parking spaces. The project would provide four car parking spaces on-site, but the remainder would be provided off-site along adjacent roadways. The project is requesting a deviation from the Municipal Code to allow the use of the off-site spaces to meet on-site parking needs. To address the unique parking needs of the project and conditions, the project completed a parking analysis (Kimley-Horn 2017). This analysis shows the project site peak parking demand would be 29 between 7:00 am and 2:00 pm. Preferred parking available on the adjacent roadways between that time would be 34 to 131 spaces. Thus, parking requirements of the Municipal Code and project-specific parking demands would be met (Kimley-Horn 2018).

Overall, the project would not conflict with any applicable plan in a manner that would result in significant secondary environmental impacts.

c) Conflict with any applicable habitat conservation plan or natural community conservation plan? ☐ ☐ ☐ ☒

The project site is not within a MHPA as designated under the City of San Diego MSCP Subarea Plan (City of San Diego 1997).

XI. MINERAL RESOURCES – Would the project:

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

The areas around the project are not being used for the recovery of mineral resources and are not designated by the General Plan, Barrio Logan/Harbor 101 Community Plan, or other local, state, or federal land use plan for mineral resources recovery; therefore, the project would not result in the loss of mineral resources.

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

Refer to XI(a).
### XII. NOISE – Would the project result in:

a) Generation of, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

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Applicable standards include noise/land use compatibility guidelines established in the City of San Diego General Plan as well as construction and operational standards established in the Noise Abatement and Control Ordinance.

**Noise/Land Use Compatibility Standards**

The noise environment in the vicinity of the project site is primarily attributable to vehicle traffic on the I-5 Freeway and associated ramps to the north/east of the project site. Other noise sources include vehicle traffic on local roadways.

The project proposes an expansion of an existing ER&T facility. The use would not be noise sensitive. Noise levels are not anticipated to exceed City’s noise/land use compatibility standards for industrial uses or result in an impact related to noise exposure. Noise/land use compatibility impacts would be less than significant.

**Construction Noise Standards**

Pursuant to Section 59.5.0404 of the Noise Abatement and Control Ordinance, construction must be limited to between the hours of 7:00 a.m. and 7:00 p.m. and noise levels may not exceed a 12-hour equivalent noise level (Leq) of 75 A-weighted decibels (dB(A)) at or beyond the property line of a residually zoned property. Surrounding properties are zoned Subdistrict B or the Barrio Logan Plan District (BLPD-SUBD-B).

Project construction would result in noise from diesel engine-driven construction equipment used for demolition, site preparation, and grading; removal of existing structures and pavement; and loading, unloading, and placing materials and paving.

The nearest residually zoned properties are approximately 365 feet north of the project site, on the opposite side of the I-5 Freeway. The I-5 Freeway is raised approximately 15 feet (overpass height) above the elevation of the project site and the nearest residences to the northeast side of the I-5 Freeway. Due to the distance between the project site, sound level decreasing 6 dB each time the distance from the source is doubled, and the nearest residually zoned property and the acoustic shielding provided by the I-5 Freeway, construction noise is anticipated to attenuate to well below 75 dB(A) Leq at the property line of all residually zoned properties. Construction noise impacts would be less than significant.
Operational Noise Standards

Section 59.5.0404 of the Noise Abatement and Control Ordinance establishes general noise level limits based on land use type and time of day. Land uses in the vicinity of the project site include a highly diverse mix of industrial, commercial, and residential uses. General noise level limits are least strict at the property line of industrial and agricultural uses, and most strict at the property line of single-family residential uses. Noise level limits at the property line of single-family residential uses are 50 dB(A) Leq in the daytime (7:00 a.m. to 7:00 p.m.), 45 dB(A) Leq in the evening (7:00 p.m. to 10:00 p.m.), and 40 dB(A) Leq at night (10:00 p.m. to 7:00 a.m.). The nearest single-family residential uses include 3657 Dalbergia Street and 2004 Vesta Street immediately south across Dalbergia Street, and 3704 Dalbergia Street and 1929 Vesta Street immediately southeast across Vesta Street.

The purpose of the project is to expand and enhance the existing ER&T facility to increase solid waste diversion. Noise-generating equipment and activities associated with operation of the proposed ER&T facility would be similar to those associated with the existing ER&T facility. Proposed equipment associated with the anaerobic digester facility such as compressors, chillers, and filtration systems would be enclosed in the anaerobic digester facility.

Based on similar facilities in the cities of Lemon Grove and Escondido, internal noise levels during the daytime hours would be approximately 85 dB during peak activities. Peak activity would include heavy equipment moving large amounts of debris, heavy trucks positioning and dumping loads, material moving through a variety of conveyors, and operation of mechanized separation systems, size reducer and baler. However, building attenuation would reduce noise levels at off-site receivers. If the proposed building had solid walls, the building would attenuate noise levels by at least 45 dB. However, several components would reduce the effectiveness of the structure in reducing noise. Along the west face of the building, several existing and future ventilation openings are located approximately 20 feet above ground elevation with emergency access doors at ground level. Along the southern face, there is an entrance for large transfer trucks and a small loading dock. The loading dock is oriented to the north toward I-5. All doors would remain closed between 10:00 p.m. and 5:00 a.m. Even with doors closed, the ventilation openings along the western face of the building would allow a minimal amount of noise through the openings, thus reducing the noise reduction achieved along this wall to approximately 40 dB. As the southern wall opening would remain closed during the period of concern, this wall would continue to achieve the 45 dB reduction. During peak activities, noise levels at the western and southern facades exterior noise levels would be about 40 to 45 dB. Additionally, the reconfiguration and expansion of the site primarily allows the building to enclose previously exposed areas to the south and allows for improved circulation of vehicles onsite; thus, reducing the potential for on-site movement conflicts by separating the ingress and egress of waste collection vehicles and completely separating the movement of the larger waste haulers from the collection trucks.

Based on the Noise Ordinance, the noise level limit applicable to the project at the most restrictive location would be 62.5 dB between 7:00 a.m. and 7:00 p.m., 60 between 7:00 p.m. and 10:00 p.m., and 57.5 dB between 10:00 p.m. and 7:00 a.m. The building has a 5-foot setback from the property line and it is 100 feet to the property lines across the adjoining streets. At 100 feet, the peak internal noise levels would potentially reach 22 dB at the residential property lines across Dalbergia and

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Vesta Streets. Therefore, noise levels using the most active period would comply with all residential noise level limits. As activity level would be less during the nighttime hours, noise levels at nighttime would similarly comply. The property located to the north of the project site is a commercial land use and the most restrictive noise level limit at this location would be 67.5 dB between 7:00 p.m. and 7:00 a.m. The nearest property line to the facility doors is approximately 200 feet way. With the combination of trucks moving within the driveway, hourly noise levels at this location would reach up to 65 dB. The property to the east of the project site is I-5 and does not have a noise level requirement. Thus, the expansion of the existing ER&T facility would not result in substantial noise level increases and would not result in noise levels that exceed noise level limits from the City of San Diego Noise Ordinance.

In addition to the physical expansion of the existing ER&T facility, the project would also extend hours of operation to allow for internal processing up to 24-hours a day (existing operation is limited to between 6:00 a.m. and 7:00 p.m.) and would extend the hours for accepting waste from between 6:00 a.m. and 7:00 p.m. to between 5:00 a.m. and 7:00 p.m. and be open for receiving on Sundays. The 24-hour component of operations would only apply to internal materials processing. Standard practices during these hours include keeping vehicle bay doors closed; due to the attenuation provided by the building shell indoor activities would not be anticipated to result in noise levels that exceed noise level limits from the City of San Diego Noise Ordinance. Additionally, entrances to the building oriented to the northwest and the raised topography of I-5 running along the northeast of the project site result in substantial noise shielding of the nearest noise sensitive uses, which are located to the southwest along Vesta Street (shielded by building orientation) and to the northeast across the I-5 (shielded by raised topography). Existing operations during the 6:00 a.m. hour do not result in noise levels that exceed applicable level limits for the 10:00 p.m. to 7:00 a.m. period. Additional operation during the 5:00 a.m. hour would be similar to existing operation during the 6:00 a.m. hour and thus would also not be anticipated result in noise levels that exceed applicable noise level limits. Operations noise impacts would be less than significant.

b) Generation of, excessive ground borne vibration or ground borne noise levels?

Although it is possible for vibrations from construction projects to cause building damage, the vibrations from standard construction activities are almost never of sufficient amplitude to cause more than minor cosmetic damage to buildings (FTA 2006). The project would involve standard construction activities that do not require the use of equipment that creates significant ground-borne vibration or ground-borne noise. Furthermore, no uses occur in the area that produce ground-borne vibration or noise. Standard construction equipment would be used such as loaders, backhoes, graders, scrapers, forklifts, and rollers. As the project construction would not involve vibration-generating activities such as explosive blasting or pile driving, construction vibration levels are not anticipated to result in substantial human annoyance or structural damage. Construction-related vibration impacts would be less than significant.

No substantial sources of ground-borne vibration would be associated with operation of the project. Operation of the project is not anticipated to result in substantial human annoyance or structural damage. Operation-related vibration impacts would be less than significant.
The purpose of the project is to expand and enhance the existing ER&T facility to increase solid waste diversion. Barrio Logan Community Plan Update Final EIR documented that the project site is located within the 75 dB CNEL contour under existing and 2030 conditions (City of San Diego 2013). Noise-generating activities associated with operation of the proposed ER&T facility would be similar to those associated with the existing ER&T facility and any increase would not be perceptible considering ambient noise conditions. Thus, the project would not result in substantial increases in noise levels generated by the ER&T facility. The project would extend As described in Section XII(a) above, exterior noise levels for the proposed building would range between 40 and 45 dB. Consequently, future operations within the proposed building would not generate excessive noise levels that would increase the existing noise levels above the existing 75 dB CNEL documented for the project site. Additionally, operational activities outside the proposed building are generally constant with the exception of the movement and positioning of trucks and other equipment that occurs periodically. The most audible noise associated with these periodic activities would be generated by back-up alarms, which typically last less than a minute at a time and generally occur three or four times an hour during peak activity periods. The project would not increase solid waste throughput, and therefore would not increase trucks trips. Similarly, the The project would extend hours for accepting waste from between 6:00 am and 7:00 pm to between 5:00 am and 7:00 pm and would be open for receiving on Sundays. Temporary noise level increases for the hour between the 5:00 am and 6:00 am and Sunday operations may be associated with passbys of transfer trailers or collection trucks. These trips would enter and exit the site via Vesta Street and/or Dalbergia Street. The noise environment in the vicinity of the project site is primarily attributable to vehicle traffic on the I-5 Freeway. Noise generated by this limited number of truck passbys would be anticipated to result in less than a 3 dB(A) CNEL increase, and would therefore not rise to a level of significance based on the City’s significance thresholds, which states that if the project would result in a “less than 3 dB increase, then the impact is not considered significant.” Therefore, increased operations associated with the project would not result in a substantial permanent increase of ambient noise levels and impacts would be less than significant.

Refer to XII(c).
The closest airport to the project site is the SDIA, approximately 5 miles north of the site. An ALUCP has been prepared for the SDIA, and the project site is not located within the boundaries of the designated AIA (SDIA ALUCP Exhibit 1-1 Airport Influence Area). The noise contour for SDIA (SDIA ALUCP Exhibit 2-1 Noise Contour Map) does not encompass the project site. Therefore, people working at the facility would not be exposed to excessive noise levels due to airport activity.

The Naval Air Station North Island airport, located on the Coronado peninsula, does not have an adopted ALUCP (City of San Diego General Plan). However, as identified in the City of San Diego General Plan (City of San Diego 2008), the project site is not located within an identified noise contour associated with Naval Air Station North Island airfield. Therefore, people working at the facility would not be exposed to excessive noise levels due to airport activity.

As such, the project would not expose people to working in the area to excessive aircraft noise levels. No impact would result.

The project site is not within the vicinity of a private airstrip. No impact would occur.

XIII. POPULATION AND HOUSING – Would the project:

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

The project involves the redevelopment of an existing industrial site, the use of which would remain industrial. As such, the project does not include the addition of new homes or businesses to the area, and no additional roadways, public utilities or other infrastructure would be constructed that would induce growth. While additional employment opportunities may result, the project increase in employment would be relatively minimal and would not result in additional people moving to the region. Thus, the project would not induce substantial population growth either directly or indirectly.
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<tr>
<td>b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?</td>
<td>☐</td>
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The project involves the redevelopment of an existing industrial site and a vacant site. As such, the project would not displace existing housing, and would therefore not require the construction of replacement housing elsewhere.

| c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? | ☐                             | ☐                                             | ☐                           | ☑        |

The project involves the redevelopment of an existing industrial and vacant site. There are no current residents living on-site, and the land use associated with the project would remain as a waste collection facility. As such, the project would not displace substantial numbers of people, and would therefore not require the construction of replacement housing elsewhere.

XIV. PUBLIC SERVICES

a) Would the project result in substantial adverse physical impacts associated with the provisions of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service rations, response times or other performance objectives for any of the public services:

i) Fire protection | ☐                             | ☐                                             | ☐                           | ☑        |

The project involves the redevelopment of an existing industrial and vacant site. The 2-acre project would not require the provision or alteration of a new or existing fire protection facility. No impact would occur.

ii) Police protection | ☐                             | ☐                                             | ☐                           | ☑        |

The project involves the redevelopment of an existing industrial and vacant site. The 2-acre project would not require the provision or alteration of a new or existing police protection facility. No impact would occur.

iii) Schools | ☐                             | ☐                                             | ☐                           | ☑        |

The project involves the redevelopment of an existing industrial site. As such, the project would have no impact on existing school facilities, as the project would not introduce a new population base that would require additional schools.

iv) Parks | ☐                             | ☐                                             | ☐                           | ☑        |

The project involves the redevelopment of an existing industrial site. The site currently operates as a recycling facility and would continue to operate as a recycling facility once the project is complete. As such, the project would have no impact on existing park facilities, as the project would not introduce a new population or employment base that would require additional or expanded park facilities.
Project construction may result in temporary reductions in the amount of mixed solid waste received by the facility. During this time mixed solid waste would be diverted to other facilities. Temporarily diverted mixed solid waste would not require additional or expanded public facilities.

The project involves the redevelopment of an existing industrial and vacant site. The 2-acre project would not require the provision or alteration of a public facility. No impact would occur.

XV. RECREATION

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

The project involves the redevelopment of an existing industrial and vacant site. The 2-acre project would not require the provision or alteration of a recreational facility. No impact would occur.

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

See XV(a).

XVI. TRANSPORTATION/TRAFFIC – Would the project:

a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

The project would retain the existing permitted capacities of the facility and would not generate additional truck traffic. However, the project would increase the number of employees on-site. The additional employees would generate an additional 158 average trips per day, with 27 trips during the morning peak hour (15 inbound, 12 outbound) and 24 trips during the evening peak hour (12 inbound, 12 outbound) (Kimley-Horn 2018). The additional operational hours proposed by the project would result in trips being spread throughout the day. More specifically, the work shifts
include the project’s 23 employees in addition to two management employees from 5:00 am to 3:00 p.m., three additional management employees from 7:00 a.m. to 5:00 p.m., and operational staff shifts from 4:00 a.m. to 1:00 p.m. and 2:00 p.m. to 11:00 p.m. The 60-minute transition period between 1:00 p.m. and 2:00 p.m. operational staff shifts would minimize overlap in parking demand from the two shifts. While the project would allow for internal processing to occur 24 hours per day, this is provided to allow flexibility with the timing of shifts to start earlier than 4 a.m. or extend later than 11 p.m. to accommodate processing demands when surges of inbound tonnage occur and to allow for ancillary operations. However, the shift change between 1:00 p.m. and 2:00 p.m. will be retained to ensure there is no overlap in parking demand. Thus, at any one time during daytime hours, the total number of employees on the project site would be a maximum of 28 persons. Full staffing between 11 p.m. and 4 a.m. is not anticipated on a regular basis; however, there may be employees (up to a maximum of 23) on-site during these hours to allow for flexibility in operations.

Per the City of San Diego Traffic Impact Study Guidelines (1998), a project that is consistent with the community plan would need a traffic analysis to evaluate impacts if it generated over 1,000 average daily traffic or 100 trips during the peak hour. Considering the trips anticipated from the project and this screening-level threshold, the project trip generation would be expected to have a less than significant impact.

The project would not alter transit routes or pedestrian or bicycle usage. The San Diego Metropolitan Transit System Bus Route 929 has a transit stop at the intersection of Main Street and Vesta Street, which is about 800 feet from the site. Route 929 connects from Downtown and Otay Nestor, and generally accommodates the hours of employee shifts. Bicycle parking stalls and racks would be provided on-site. While the project would require driveway width deviations, the physical change relative to the existing condition would not result in significant impacts to the ability to walk or bicycle through the area. The reduction of driveways on Dalbergia Street would reduce the traffic conflicts with pedestrians and bicyclists. Overall, the project changes related to traffic would not conflict with regulations pertaining to the circulation system.

b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Refer to XVI(a). Additionally, state Minimum Standards enforceable under the SWFP requires that traffic flow through the facility shall be controlled to prevent interference with adjacent public streets. As indicated above, the project trips generated would have a less than significant impact and no conflict would occur.

---

1 It is noted that limited management staff would remain on-site during this processing shift change period to manage solid waste operations.
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks? □ □ ☒ □ ☒

As indicated previously, the project is not located within an adopted ALUCP Airport Influence Area or APZ. Implementation of the project would not result in a change in air traffic patterns, as the project would not be constructed at a height that would impair air travel. Impacts would be less than significant.

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

Refer to XVI(a) and X(b). The project would not include improvements to roadways but would modify existing driveways. As previously described, the project would include a 45-foot-wide main driveway at the northwest corner of the site and a secondary 35-foot-wide driveway at the southeast corner of the site. The project driveways would require an allowable deviation to allow exceedance of the driveway width standard; however, the deviation would allow for the existing driveways to be reduced from four to two and the increased widths would be necessary to accommodate the large trucks. In addition, the change in the main access driveway further from the Dalbergia Street and Vesta Street intersection would also improve safety by spacing turning movements further apart. The change in driveway configuration would not result in an increased hazard relative to the existing conditions. Thus, the project would not result in an increase in hazard due to design feature.

e) Result in inadequate emergency access? □ □ □ ☒ ☒

As the project access driveways are designed for large vehicles, they would also adequately accommodate emergency vehicle access. Similarly, internal circulation is also geared towards large vehicles and would provide adequate turn-around areas and overall emergency access. No impact would occur.

f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities? □ □ □ ☒ ☒

The project would retain the existing sidewalks along the perimeter and would not alter any public transit or bicycle facilities. Refer to XVI(a). Therefore, the project would have no impact to public transit, bicycle, or pedestrian facilities.
XVII. TRIBAL CULTURAL RESOURCES – Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

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

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The project would not cause a substantial adverse effect to tribal cultural resources, as there are no recorded sites listed or sites eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined by the Public Resources Code. No impact would result.

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

Tribal Cultural Resources include sites, features, places, cultural landscapes, and sacred places or objects that have cultural value or significance to a Native American Tribe. Tribal Cultural Resources include “non-unique archaeological resources” that, instead of being important for “scientific” value as a resource, can also be significant because of the sacred and/or cultural tribal value of the resource. Tribal representatives are considered experts appropriate for providing substantial evidence regarding the locations, types, and significance of tribal cultural resources within their traditionally and cultural affiliated geographic area (Public Resources Code § 21080.3.1(a)).

The City of San Diego, as Lead Agency, determined that Tribal Cultural Resources pursuant to subdivision Public Resources Code Section 5024.1(c) would not be potentially impacted through project implementation, as the project site has been developed and is located within an urban area. Although no resources occur on site, the project site is within one-mile radius of recorded archaeological sites. Therefore, in accordance with the requirements of Public Resources Code 21080.3.1, the City of San Diego provided formal notification to the Iipay Nation of Santa Isabel and the Jamul Indian Village, both traditionally and culturally affiliated with the project area, requesting consultation via email on May 16, 2017. Both Native American Tribes responded within the 30-day formal notification period and determined that tribal cultural resources are not anticipated onsite; therefore, consultation was not necessary and the consultation process was concluded. No impact would result.
XVIII. UTILITIES AND SERVICE SYSTEMS - Would the project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?  
   - Potentially Significant Impact: 
   - Less Than Significant with Mitigation Incorporated: ❌ 
   - Less Than Significant Impact: □
   - No Impact: □

The inclusion of an anaerobic digester facility co-located with an existing permitted solid waste facility would not increase wastewater treatment demands substantially above those already needed to serve the existing facility. The AD technologies have limited requirement for process water. Water is introduced into the AD system via the organic waste itself. Depending on the moisture content of the organic waste processed in the dry digesters, there may be periods when additional percolate water makeup is required (in the case of lower moisture content feedstocks), or when excess percolate is generated (in the case of higher moisture content feedstocks). When there are periods with wetter organics, this percolate is sanitized and held to be applied later when the incoming organic waste material is dryer. There would be no need for discharges to the wastewater system. The project would include all on-site wastewater and water system improvements necessary to serve the project. No new or expanded water or wastewater-related facilities would be required (Statewide Anaerobic Digester Facilities for the Treatment of Municipal Organic Solid Waste Final Program Environmental Impact Report, SCH No. 2010042100, June 2011).

b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?  
   - Potentially Significant Impact: □
   - Less Than Significant with Mitigation Incorporated: ❌
   - Less Than Significant Impact: □
   - No Impact: □

A sewer study (Hacunda 2017) was completed for the project to address the adequacy of the existing wastewater facilities to serve the project. Per that report, the existing pipes are flowing at between 12 and 16 percent of capacity. The project would provide all on-site improvements needed to serve the project in accordance with the City Design Guidelines. This includes a single 8-inch line connection into an existing manhole designed to match the invert of the existing 27-inch polyvinyl chloride (PVC) trunk sewer. The project would also provide on-site water line improvements, and no changes to the 6-inch water line in Dalbergia Street or 16-inch water line in Vesta Street is anticipated. As no new or expanded off-site facilities would be required, impacts would be less than significant.

c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?  
   - Potentially Significant Impact: □
   - Less Than Significant with Mitigation Incorporated: ❌
   - Less Than Significant Impact: □
   - No Impact: □

The project proposes to intercept the majority of the runoff from Caltrans slope with a concrete v-ditch along the project’s easterly boundary and divert the majority of the flow south to Vesta Street. A small runoff amount of the Caltrans slope would be intercepted by a concrete v-ditch and diverted north to Una Street. To compensate for this minor diversion to the Paleta Creek watershed, it is proposed to divert some runoff of the existing roof area that currently drains to Dalbergia Street and redirect those flows into the Chollas Creek Basin. The Caltrans slope runoff can be re-directed to the City streets (Una and Vesta) without impacting downstream facilities. The project would result in
small quantities of runoff water associated with cleaning the proposed facility. The project would be designed so as to comply with the relevant City Drainage Codes, Policies and General Permits (Hacunda 2017 and 2018). As no new or expanded off-site facilities would be required, impacts would be less than significant. See Section IX above for additional information.

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<td>d)</td>
<td>Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?</td>
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The project would not generate substantial additional demand for water. Small quantities of water demand would be associated with cleaning the proposed facility. Regional water planning documents utilize zoning and land use designations to determine water demand and to ultimately determine the entitlements needed to provide adequate water supply. The project would not alter the zoning or land use of the site and, therefore, would not result in a need to revise estimated regional water demands or alter existing entitlements. Therefore, the project would not result in a need to alter existing water entitlements and would have no impact related to water supply entitlements.

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

| ☐ | ☐ | ☐ | ☒ |

The project includes all on-site wastewater improvements necessary to serve the project, and no off-site improvements would be required to provide wastewater treatment for the project. The project would not increase wastewater generated at the site. Thus, the project would have no impact related to wastewater treatment capacity.

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

| ☐ | ☐ | ☒ | ☐ |

The project would generate minimal changes in solid waste generation, as the increase in employees would be relatively minimal and the project would implement a Waste Management Plan (RECON 2018). Refer to XVIII(g), below, for additional details. Thus, project impacts related to solid waste would be less than significant.

g) Comply with federal, state, and local statutes and regulation related to solid waste?

| ☐ | ☐ | ☒ | ☐ |

The applicable regulations related to solid waste disposal include: AB 341, which sets a policy goal of 75 percent waste diversion by the year 2020; City of San Diego Zero Waste Plan, adopted July 2015; the City's Recycling Ordinance, adopted November 2007, which requires on-site recyclable collection for residential and commercial uses; the City's Refuse and Recyclable Materials Storage Regulations
indicates the minimum exterior refuse and recyclable material storage areas required at residential and commercial properties; the Construction and Demolition (C&D) Debris Deposit Ordinance requires that the majority of construction, demolition, and remodeling projects requiring building, combination, or demolition permits pay a refundable C&D Debris Recycling Deposit and divert at least 50 percent of their waste by recycling, reusing, or donating reusable materials; and AB 1826 requires businesses in California to arrange for recycling services for organic waste including food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste.

Per the City of San Diego requirements, a Waste Management Plan (WMP) for the project has been prepared (RECON 2018). The following is a discussion of the information contained within the WMP.

Demolition, Grading, and Construction Waste
The project would require the demolition (removal) of 441 tons of asphalt. The entirety of this waste would be diverted for reuse at an appropriate facility. Grading associated with the project would result in the net export of 7,800 tons of soil. The entirety of this soil would be recycled using the City of San Diego Clean Fill Dirt Program or other approved program. Any vegetation removal associated with grading activity would be taken to Miramar Greenery facility for 100 percent composting. Construction of the project is estimated to generate 65 tons of waste. It is estimated that 75.4 percent of this waste would be diverted to appropriate facilities for reuse; only 5 tons of drywall and trash/garbage (24.6 percent) would be disposed of in landfill. This may include materials contaminated with waste from the current operations.

Table 6 summarizes the amount of waste estimated to be generated and diverted by each phase of the project. Of the 8,306 tons estimated to be produced, 8,290 tons would be diverted, primarily through source separation. This would result in 99.8 percent of waste material diverted from the landfill for reuse.

<table>
<thead>
<tr>
<th>Phase</th>
<th>Tons Generated</th>
<th>Tons Diverted</th>
<th>Tons Disposed</th>
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<tbody>
<tr>
<td>Demolition</td>
<td>441</td>
<td>441 (100%)</td>
<td>0</td>
</tr>
<tr>
<td>Grading</td>
<td>7,800</td>
<td>7,800 (100%)</td>
<td>0</td>
</tr>
<tr>
<td>Construction</td>
<td>65</td>
<td>49 (75%)</td>
<td>16 (25%)</td>
</tr>
<tr>
<td>Total</td>
<td>8,306</td>
<td>8,290 (99.8%)</td>
<td>16 (0.2%)</td>
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Waste diversion would be conducted through source separation, where materials are separated on-site before transport to appropriate facilities that accept specific material types and a greater diversion rate is achieved. Recyclable waste materials would be separated on-site into material-specific containers and diverted to an approved recycler selected from the City of San Diego’s Environmental Services Department directory of facilities that recycle specific waste materials from construction and demolition. These facilities achieve a 100 percent diversion rate for most materials and a 62 percent diversion rate for drywall. Given the waste reduction target of 75 percent, the majority of waste would be handled at facilities other than landfills, thereby ensuring the project would comply with statutes and regulation related to solid waste for demolition, construction, and grading activities.
Operational Waste
The operational waste generated by the project is estimated to amount to a total of 3.3 tons of waste per year. Table 7 summarizes the estimated occupancy phase waste generation.

<table>
<thead>
<tr>
<th>Land Use (habitable space)</th>
<th>Amount (sf)</th>
<th>Annual Generation Rate(^1)</th>
<th>Waste Generated (tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Office</td>
<td>3,304</td>
<td>1,998 pounds per thousand sf</td>
<td>3.3</td>
</tr>
<tr>
<td>Total</td>
<td>-</td>
<td>-</td>
<td>\textbf{3.3}</td>
</tr>
</tbody>
</table>

\textbf{Table 7}
Occupancy Phase Annual Waste Generation

The project would include 3,304 square feet of habitable building space for non-residential uses, generating approximately 3.3 tons of waste per year, and would be required to provide a minimum of 144 square feet of exterior refuse area and the same amount of recyclable material storage area (total of 288 square feet). According to the City Waste Management Guidelines (City of San Diego 2013), compliance with existing ordinances is expected to achieve a 40 percent diversion rate. Therefore, waste anticipated to be diverted during the occupancy phase would be approximately 1.32 tons per year. The remaining 1.98 tons per year would not exceed the 60-ton-per-year threshold of significance for a cumulative impact on solid waste services in the City.

With implementation of the strategies outlined in the WMP and compliance with all applicable City ordinances, solid waste impacts would be reduced to below a level of significance regarding collection, diversion, and disposal of waste generated from C&D, grading, and occupancy.

XIX. MANDATORY FINDINGS OF SIGNIFICANCE

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

\[\square \quad \square \quad \square \quad \square \quad \square\]

The project site does not contain any sensitive riparian habitat or other identified habitat community. The site is within an urban area and contains existing development. Furthermore, the project site is not within a conservation area, as identified in the City of San Diego MSCP. As such, the project would not impact any special status species. There are no areas within the project site that may be used as a wildlife corridor for any native resident wildlife species, and since the site is already built out, construction and operation of the project would not interfere with the movement of any native resident or migratory fish. The site is not used as a native wildlife nursery, and is not...
located adjacent to or near any native wildlife nursery. The project site is not within a MHPA as designated under the City of San Diego MSCP Subarea Plan (City of San Diego MSCP 1997).

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

As documented in this Initial Study, the project would result in less than significant impacts for all issue areas with the exception of odor. Mitigation measures have been proposed to reduce impacts to less than significant, which would also ensure the project does not contribute to a cumulative impact. The project would comply with the City's CAP and assist the City with meeting CAP solid waste goals and thus, cumulative GHG emissions of the project would be less than significant. No other potentially significant cumulative impacts have been identified. As such, the project is not anticipated to contribute to potentially significant cumulative environmental impacts.

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

As discussed throughout this document, no hazardous conditions on the project site or in the surrounding area were identified that could adversely affect human beings. It is not anticipated that demolition or construction activities would create conditions that would significantly directly or indirectly impact human beings. The expansion of the existing facility would comply with all state and City regulations that would ensure the building is safe and designed to protect future occupants. The project would not result in any substantial adverse effects on human beings directly or indirectly.
I. Aesthetics / Neighborhood Character
   - City of San Diego General Plan
   - Community Plans: Barrio Logan/ Harbor 101 Community Plan

II. Agricultural Resources & Forest Resources
   - City of San Diego General Plan
   - U.S. Department of Agriculture, Soil Survey - San Diego Area, California, Part I and II, 1973
   - California Agricultural Land Evaluation and Site Assessment Model (1997)
   - Site Specific Report:

III. Air Quality
   - California Clean Air Act Guidelines (Indirect Source Control Programs) 1990
   - Regional Air Quality Strategies (RAQS) - APCD
   - Site Specific Report:
     Air Quality Analysis for the EDCO Material Recovery & Transfer Station Expansion
     Project, San Diego, California, Project No. 515674; RECON Environmental, Inc., July 30, 2018.

IV. Biology
   - City of San Diego, Multiple Species Conservation Program (MSCP), Subarea Plan, 1997
   - City of San Diego, MSCP, "Vegetation Communities with Sensitive Species and Vernal Pools" Maps, 1996
   - City of San Diego, MSCP, "Multiple Habitat Planning Area" maps, 1997
   - Community Plan - Resource Element
   - California Department of Fish and Game, California Natural Diversity Database, "State and Federally-listed Endangered, Threatened, and Rare Plants of California," January 2001
   - California Department of Fish and Game, California Natural Diversity Database, "State and Federally-listed Endangered and Threatened Animals of California," January 2001
   - City of San Diego Land Development Code Biology Guidelines
   - Site Specific Report:
V. **Cultural Resources (includes Historical Resources)**
- City of San Diego Historical Resources Guidelines
- City of San Diego Archaeology Library
- Historical Resources Board List
- Community Historical Survey
- Site Specific Report:

VI. **Geology/Soils**
- City of San Diego Seismic Safety Study
- Site Specific Report:
  - Geotechnical Investigation, EDCO Material Recovery Facility and Transfer Station Expansion, 3660 Dalbergia Street, San Diego, CA; GEOCON, Inc., September 2016.

VII. **Greenhouse Gas Emissions**
- Site Specific Report:

VIII. **Hazards and Hazardous Materials**
- San Diego County Hazardous Materials Environmental Assessment Listing
- San Diego County Hazardous Materials Management Division
- FAA Determination
- State Assessment and Mitigation, Unauthorized Release Listing, Public Use Authorized
- Airport Land Use Compatibility Plan
- Site Specific Report:

IX. **Hydrology/Drainage**
- Flood Insurance Rate Map (FIRM)
- Federal Emergency Management Agency (FEMA), National Flood Insurance Program-Flood Boundary and Floodway Map
Clean Water Act Section 303(b) list, http://www.swrcb.ca.gov/tmdl/303d_lists.html

Site Specific Report:


X. Land Use and Planning
- City of San Diego General Plan
- Community Plan: Barrio Logan/Harbor 101 Community Plan
- Airport Land Use Compatibility Plan
- City of San Diego Zoning Maps

FAA Determination:

Other Plans:

XI. Mineral Resources
- California Department of Conservation - Division of Mines and Geology, Mineral Land Classification
- Division of Mines and Geology, Special Report 153 - Significant Resources Maps
- City of San Diego General Plan:
- Site Specific Report:

XII. Noise
- City of San Diego General Plan
- Community Plan:
  - San Diego International Airport - Lindbergh Field CNEL Maps
  - Brown Field Airport Master Plan CNEL Maps
  - Montgomery Field CNEL Maps
  - San Diego Association of Governments - San Diego Regional Average Weekday Traffic Volumes
  - San Diego Metropolitan Area Average Weekday Traffic Volume Maps, SANDAG
- Other:
XIII. **Paleontological Resources**

- City of San Diego Paleontological Guidelines
- Kennedy, Michael P., and Gary L. Peterson, "Geology of the San Diego Metropolitan Area, California. Del Mar, La Jolla, Point Loma, La Mesa, Poway, and SW 1/4 Escondido 7 1/2 Minute Quadrangles," *California Division of Mines and Geology Bulletin* 200, Sacramento, 1975
- Kennedy, Michael P., and Siang S. Tan, "Geology of National City, Imperial Beach and Otay Mesa Quadrangles, Southern San Diego Metropolitan Area, California," Map Sheet 29, 1977

XIV. **Population / Housing**

- City of San Diego General Plan
- Community Plan:
  - Series 11/Series 12 Population Forecasts, SANDAG
- Other:

XV. **Public Services**

- City of San Diego General Plan
- Community Plan

XVI. **Recreational Resources**

- City of San Diego General Plan
- Community Plan
- Department of Park and Recreation
- City of San Diego - San Diego Regional Bicycling Map
- Additional Resources:
XVII. Transportation / Circulation

☐ City of San Diego General Plan
☐ Community Plan:
☐ San Diego Metropolitan Area Average Weekday Traffic Volume Maps, SANDAG
☐ San Diego Region Weekday Traffic Volumes, SANDAG
☒ Site Specific Report:


XVIII. Utilities

☐ Site Specific Report:

Preliminary Sanitary Sewer Study for the Enhancement of EDCO Recovery & Transfer Facility at 3660 Dalbergia Street, San Diego, CA; Paul J. Hacunda, July 10, 2017.


XIX. Water Conservation


XX. Water Quality

☒ Clean Water Act Section 303(b) list, http://www.swrcb.ca.gov/tmdl/303d_lists.html
☒ Site Specific Report:


XXI. Other:

Regional Location
EDCO ER&T Station/Project No. 515674
City of San Diego – Development Services Department
Map Source: USGS 7.5 minute topographic map series, NATIONAL CITY (1996) & POINT LOMA (1994) quadrangles, Pueblo Lands of San Diego Land Grant

Project Location on USGS Map
EDCO ER&T Station/Project No. 515674
City of San Diego – Development Services Department

FIGURE No. 2
Project Location on City 800' Map
EDCO ER&T Station/Project No. 515674
City of San Diego – Development Services Department
Project Location on Aerial Photograph
EDCO ER&T Station/Project No. 515674
City of San Diego – Development Services Department