WASTE MANAGEMENT PLAN
FOR

9455 Towne Centre Drive Redevelopment Project

San Diego, California
Project No. 291342

Prepared for:
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1.0 INTRODUCTION

The purpose of this Waste Management Plan (WMP) for the 9455 Towne Centre Drive Redevelopment Project in the City of San Diego is to provide analysis of the solid waste impacts anticipated for the 9455 Towne Centre Drive Redevelopment Project and how those impacts will be mitigated. The goal of this WMP is to identify sufficient mitigation to reduce the potential impacts of the 9455 Towne Centre Drive Redevelopment Project on solid waste services. Two acceptable approaches to managing waste are to reduce the tons disposed to 60 tons or less, or to provide diversion of 75 percent or more, thus meeting the goal established by Assembly Bill 341.

The 3.9-acre 9455 Towne Centre Drive Redevelopment Project site is located at 9455 Towne Centre Drive, San Diego, California 92121. The site is situated immediately south of Eastgate Mall between Towne Centre Drive and Judicial Drive and is within the University Community Plan area. (See Figure 1, 9455 Towne Centre Drive Redevelopment Project Location and Aerial.) Scientific research and development, light industrial, medical office, and commercial office development surrounds the property, with Interstate 805 located further east of the project site.

The 9455 Towne Centre Drive Redevelopment Project development proposes to demolish the existing two-story, 47,091-square-foot office building, associated facilities and surface parking and redevelop the site with a five-story, 150,000-square office building and either a five-story parking garage (Parking Option A) or a four-story aboveground parking with one interconnected parking level beneath the office building (Parking Option B). (See Figure 2, 9455 Towne Centre Drive Redevelopment Project Site Plan). The project requires discretionary approval including: General Plan Amendment and Community Plan Amendment to increase the development intensity allocated to the project site in the University Community Plan, Site Development Permit, and Planned Development Permit.
Figure 1
9455 Towne Centre Drive Redevelopment Project - Project Location and Aerial
Figure 2
9455 Towne Centre Drive Redevelopment Project Site Plan
This WMP consists of two sections corresponding to the implementation of site development: the *Construction Phase* (to include demolition) and the *Occupancy Phase* (post-construction). The WMP addresses the projected amount of waste that could be generated by the project based on current (2009) City generation rates and estimates; waste reduction goals; and recommended techniques to achieve the waste reduction goals, such as recycling. The project includes a two- to three-month demolition phase. Construction of the project will take approximately 12 - 15 months. Construction will take place as a single phase and is estimated to begin in the last quarter 2015. Waste disposal sites and recycling methods and opportunities may change from those available today. Therefore, this WMP includes the following general information known at the time the WMP was prepared:

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

### 2.0 BACKGROUND

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

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

In 2008, SB 1016 was chaptered. Known as the Solid Waste Disposal Measurement Act, SB 1016 maintained the 50 percent diversion requirement, but changed to a disposal-based measurement
system, expressed as the 50 percent Equivalent Per Capita Disposal Target. This built upon AB 939
by implementing a simplified and timelier indicator of jurisdiction performance that focuses on
reported disposal at Board-permitted disposal facilities. This established a goal of not recycling
more, but disposing of less. AB 341: Jobs and Recycling, chaptered in 2011, would create green jobs
by expanding recycling to every multi-family dwelling and business and would charge CalRecycle
with the responsibility for ensuring that the State is recycling at least 75 percent of the garbage that it
generates by 2020. SB 1016 establishes that compliance with State law is measured by reducing the
amount of waste material requiring disposal, and AB 341 increases the diversion target to 75 percent.

Additional local regulation pertaining to solid waste management includes the City of San Diego’s
Municipal Code Ch.14 Art. 2 Div. 8: §142.0810, §142.0820, Ch. 6 Art. 6 Div. 7; §66.0706, §66.0709,
§66.0710; and Ch. 6 Art. 6 Div. 6; §66.0711, §66.0604, §66.0606. These statues designate refuse and
recycling space allocation requirements for on-site refuse and recyclable material storage
requirements, diversion of construction and demolition debris regulations, and diversion of
recyclable materials generated from residential facilities, businesses, commercial/institutional
facilities, apartments, condominiums, and special events requiring a City permit.

The City of San Diego has established a threshold of 40,000 square feet of development as
generating sufficient waste (60 tons) to have a potentially cumulatively significant impact on solid
waste services. 9455 Towne Centre Drive Redevelopment Project as proposed exceeds this threshold. The
purpose of this WMP is to identify mitigation measures to reduce this potential impact to below a
level of significance.

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

Construction and Demolition (C&D) Debris Diversion Deposit Program applies to all applicants for
building, demolition, and removal permits. This ordinance requires that the applicant post a deposit
(Table 1, C&D Debris Deposit Table). The deposit is not returned until the applicant demonstrates
that a minimum amount of the material generated has been diverted from disposal in landfills.
Mixed construction debris recycling facilities in San Diego are evaluated quarterly to determine how
much of the throughput is recycled, and how much is a “residual” material requiring disposal.
Facilities that accept mixed debris typically achieve a 68 percent or less diversion rate. Single
materials recyclers, such as metal recyclers, often achieve a nearly 100 percent diversion rate. When
comingled materials are sent to a mixed facility, the 75 percent diversion goal established by AB 341
will not be met. Depending on the project, to ensure that the overall diversion goal is attained, some
materials must often be separated and trucked to facilities with higher diversion rates, such as
aggregate and metal recyclers.
Table 1
C&D Debris Deposit Table

<table>
<thead>
<tr>
<th>Building Category</th>
<th>Sq. Ft. Subject to Ordinance</th>
<th>Deposit per Sq. Ft.</th>
<th>Range of Deposits</th>
</tr>
</thead>
<tbody>
<tr>
<td>Residential New Construction</td>
<td>500-125,000 detached</td>
<td>$0.40</td>
<td>$200-$50,000</td>
</tr>
<tr>
<td></td>
<td>500-100,000 attached</td>
<td></td>
<td>$200-$40,000</td>
</tr>
<tr>
<td>Non-residential New Construction</td>
<td>1,000-25,000 commercial</td>
<td>$0.20</td>
<td>$200-$5,000</td>
</tr>
<tr>
<td></td>
<td>1,000-75,000 industrial</td>
<td></td>
<td>$200-$15,000</td>
</tr>
<tr>
<td>Non-residential Alterations</td>
<td>286 with no maximum</td>
<td>$0.70</td>
<td>$200 and up</td>
</tr>
<tr>
<td>Residential Demolition</td>
<td>286 with no maximum</td>
<td>$0.70</td>
<td>$200 and up</td>
</tr>
<tr>
<td>Non-residential Demolition</td>
<td>1,000 with no maximum</td>
<td>$0.20</td>
<td>$200 and up</td>
</tr>
<tr>
<td>Roof Tear-off</td>
<td>All projects</td>
<td>-</td>
<td>$200</td>
</tr>
<tr>
<td>Residential Alterations</td>
<td>500 and above</td>
<td>-</td>
<td>$1,000</td>
</tr>
</tbody>
</table>

* Projects under the minimum square footage subject to the ordinance are exempt from the C&D debris recycling deposit.

2.1 Exterior Refuse and Recyclable Material Storage Area Requirements

The 9455 Towne Centre Drive Redevelopment Project will develop in one phase over an approximate 12- to 14-month period. Development is anticipated to begin in the last quarter of 2014. Because the 9455 Towne Centre Drive Redevelopment Project project is a nonresidential development, exterior refuse and recyclable material storage areas will be provided in accordance with City regulations per Chapter 14, Article 2, Division 8: Refuse and Recyclable Material Storage Regulations, §142.0830.

2.2 Exterior Refuse and Recyclable Material Storage Areas for 9455 Towne Centre Drive Redevelopment Project

The 9455 Towne Centre Drive Redevelopment Project is an industrial development. Table 2, Minimum Exterior and Recyclable Material Storage Areas for Commercial and Industrial Developments within 9455 Towne Centre Drive Redevelopment Project, shows the required amount of refuse and recyclable storage areas for Industrial development. The project proposes 150,000 square feet of industrial development. As a result, the project would require a minimum of 576 square feet of storage area (288 square feet refuse storage area plus 288 square feet recyclable material storage area.
### Table 2
Minimum Exterior Refuse and Recyclable Material Storage Areas for Commercial and Industrial Development

<table>
<thead>
<tr>
<th>Gross Floor Area per Development (square feet)</th>
<th>Minimum Refuse Storage Area per Development (square feet)</th>
<th>Minimum Recyclable Material Storage Area per Development (square feet)</th>
<th>Total Minimum Storage Area per Development (square feet)</th>
</tr>
</thead>
<tbody>
<tr>
<td>0 – 5,000</td>
<td>12</td>
<td>12</td>
<td>24</td>
</tr>
<tr>
<td>5,001 – 10,000</td>
<td>24</td>
<td>24</td>
<td>48</td>
</tr>
<tr>
<td>10,001 – 25,000</td>
<td>48</td>
<td>48</td>
<td>96</td>
</tr>
<tr>
<td>25,001 – 50,000</td>
<td>96</td>
<td>96</td>
<td>192</td>
</tr>
<tr>
<td>50,001 – 75,000</td>
<td>144</td>
<td>144</td>
<td>288</td>
</tr>
<tr>
<td>75,001 – 100,000</td>
<td>192</td>
<td>192</td>
<td>384</td>
</tr>
<tr>
<td>101,000+</td>
<td>192 plus 48 square feet for every 25,000 square feet of building area above 100,001</td>
<td>192 plus 48 square feet for every 25,000 square feet of building area above 100,001</td>
<td>384 plus 96 square feet for every 25,000 square feet of building area above 100,001</td>
</tr>
</tbody>
</table>

Source: City of San Diego Municipal Code, Chapter 14, Article 2, Division 8: Refuse and Recyclable Material Storage Regulations, §142.0830, Table 142-08C, effective January 1, 2000.

### 3.0 EXISTING CONDITIONS

The 9455 Towne Centre Drive Redevelopment Project site encompasses approximately four acres and has been fully developed as an industrial development with one 47,091-square-foot office building and associated parking and landscaping. The project site is bordered by Eastgate Mall to the north, existing industrial development to the south, Judicial Drive to the east and Towne Centre Drive to the west. Access is provided from Towne Centre Drive and Eastgate Mall.

### 4.0 PROPOSED CONDITIONS

The 9455 Towne Centre Drive Redevelopment Project proposes to redevelop an existing two-story industrial office building with surface parking with a five-story industrial office building and parking garage on approximately four acres in the University Community (see Figure 2, 9455 Towne Centre Drive Redevelopment Project Site Plan). The existing 47,091 square feet of industrial office buildings and associated facilities and surface parking would be demolished and replaced with approximately 150,000 square feet of industrial office space and either a five-story parking garage (Parking Option A) or a four-story aboveground parking with one interconnected parking level beneath the office building (Parking Option B). Of the 3.9 acres of total site area, the graded area would encompass 3.37 acres. Grading for the proposed project would include 39,871 cubic yards of cut and 459 cubic yards of fill; there would be 39,412 cubic yards of export. The maximum height of fill slopes would be five feet; maximum height of cut slopes would be three feet. Export would be transported to another construction site in close proximity to the project site. If there are no active construction sites available, then the export material would be transported to the Miramar or Sycamore landfill, if either of those two facilities can use the material in their operation. If not, it will be recycled at one of the facilities on the certified C&D Recycling Facility Directory provided by the City, such as Enniss, Hanson, Moody’s, Robertson’s, or Vulcan.

The project requires discretionary approval including: General Plan Amendment and Community Plan Amendment to increase the development intensity allocated to the project site in the University Community Plan, Site Development Permit, and Planned Development Permit. Construction will be...
completed in a single phase over a 12- to 14-month period with construction anticipated to begin in the last quarter of 2014. Construction practices will comply with local, State, and Federal regulations regarding handling of building materials to ensure waste minimization requirements are met.

5.0 DEMOLITION WASTE

Demolition and construction will occur over a period of approximately 14 to 18 months. ESD staff would be present for an early pre-construction meeting to evaluate waste segregation, signage, and salvage.

The project site is the location of an existing industrial office development. The demolition phase will include the deconstruction/demolition and removal of the existing office buildings, associated structures, asphalt parking and walkway areas, and interior landscaping. Approximately 6,660.03 tons of waste is expected to be generated during demolition. Approximately 6,394.24 tons of material would be recycled, to include trees, concrete, asphalt, foundations, building structure, masonry walls, curb and gutter, and switch gear and cable. Approximately 271.79 tons of debris would be disposed in a landfill, to include non-useable lumber, drywall, glass, miscellaneous trash, roofing paper, broken roof tiles, and floor tile. Table 3, 9455 Towne Centre Drive Redevelopment Project Waste Generation – Demolition, summarizes the type and amount of demolition materials, as well as diversion/disposal.

Table 3
9455 Towne Centre Drive Redevelopment Project Waste Generation – Demolition

<table>
<thead>
<tr>
<th>Material Type</th>
<th>Estimated Waste Quantity (tons)</th>
<th>Handling</th>
<th>Estimated Diversion (tons)</th>
<th>Estimated Disposal (tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>DEMOLITION WASTE</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Asphalt and Concrete</td>
<td>1,999.62</td>
<td>Hanson Aggregates 9229 Harris Plant Road San Diego, CA 92126 (100% diversion)</td>
<td>1,999.62</td>
<td>--</td>
</tr>
<tr>
<td>Foundations/Building Structure</td>
<td>2,666.16</td>
<td>Vulcan Carroll Canyon Landfill and Recycle Site 10051 Black Mountain Road San Diego, CA 92126 (100% diversion)</td>
<td>2,666.16</td>
<td>--</td>
</tr>
<tr>
<td>Brick/Masonry/Tile</td>
<td>945.76</td>
<td>Vulcan Carroll Canyon Landfill and Recycle Site 10051 Black Mountain Road San Diego, CA 92126 (100% diversion)</td>
<td>945.76</td>
<td>--</td>
</tr>
<tr>
<td>Curbs/Gutter</td>
<td>166.64</td>
<td>Vulcan Carroll Canyon Landfill and Recycle Site 10051 Black Mountain Road San Diego, CA 92126 (100% diversion)</td>
<td>166.64</td>
<td>--</td>
</tr>
<tr>
<td>Switch Gear/Cable</td>
<td>0.67</td>
<td>Vulcan Carroll Canyon Landfill and Recycle Site 10051 Black Mountain Road San Diego, CA 92126 (100% diversion)</td>
<td>0.67</td>
<td>--</td>
</tr>
<tr>
<td>Drywall</td>
<td>333.27</td>
<td>EDCO Station Transfer and Buy Back Center 8184 Commercial Street La Mesa, CA 91942 (70% diversion)</td>
<td>233.29</td>
<td>99.98</td>
</tr>
<tr>
<td>Landscape Materials</td>
<td>199.96</td>
<td>Miramar Greenery 5180 Convoy Street San Diego, CA 92111</td>
<td>199.96</td>
<td>--</td>
</tr>
</tbody>
</table>
In accordance with State diversion targets, a minimum of 75 percent of construction materials will be recycled. Materials to be recycled would be redirected to appropriate recipients selected from ESD’s directory of facilities that recycle demolition materials, scrap metal, and yard waste.

### 6.0 CONSTRUCTION WASTE

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

- Asphalt and Concrete
- Brick/Masonry/Tile
- Cardboard
- Carpet, Padding/Foam
- Drywall
- Landscape Debris
- Mixed C&D Debris
- Roofing Materials
- Scrap Metal
- Unpainted Wood and Pallets
- Garbage/Trash
In accordance with State diversion targets, a minimum of 75 percent of construction materials will be recycled. Materials to be recycled would be redirected to appropriate recipients selected from ESD’s directory of facilities that recycle construction materials, scrap metal, and yard waste.

### 6.1 Managing Construction Material

To facilitate management of construction materials, the developer shall identify one person or agency connected with the proposed development to act as Solid Waste Management Coordinator, whose responsibility it becomes to work with all contractors and subcontractors to ensure material separation and coordinate proper disposal and diversion of waste generated. The Solid Waste Management Coordinator will help to ensure all diversion practices outlined in this Waste Management Plan are upheld and communicate goals to all contractors involved efficiently.

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

- Review the Solid Waste Management Plan including responsibilities of Solid Waste Management Coordinator.
- Review and update procedures as needed for material separation and verify availability of containers and bins needed to avoid delays.
- Review and update procedures for periodic solid waste collection and transportation to recycling and disposing facilities.
- The authority to issue stop work orders if proper procedures are not being allowed.

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

- Solid waste management coordinator will be responsible for educating contractors and subcontractors regarding waste management plan requirements and ensuring that contractors and subcontractors carry out the measures described in the WMP.
- Solid waste management coordinator will ensure ESD attendance at a Precon and assure compliance with segregation requirements, and verification of recycled content in base materials.
- Recycling areas will be clearly identified with large signs, approved by ESD, and sufficient amounts of material-specific bins will be provided for necessary segregation.
- Recycling bins will be placed in areas that are readily accessible to contractors/subcontractors and in areas that will minimize misuse or contamination by employees and the public.
- Solid waste management coordinator will be responsible for ensuring that contamination rates in bins remain below 5 percent by weight of the bin.
Table 4, *9455 Towne Centre Drive Redevelopment Project Waste Generation – Construction*, is included below to summarize the types of waste generated, the amount of each waste type diverted, and the overall amount remaining to be disposed of in landfills.

**Table 4**

*9455 Towne Centre Drive Redevelopment Project Waste Generation – Construction*

<table>
<thead>
<tr>
<th>Material Type</th>
<th>Estimated Waste Quantity (tons)</th>
<th>Handling</th>
<th>Estimated Diversion (tons)</th>
<th>Estimated Disposal (tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>CONSTRUCTION WASTE</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| Asphalt and Concrete        | 199.93                          | Hanson Aggregates  
9229 Harris Plant Road  
San Diego, CA 92126  
(100% diversion)       | 199.93                     | --                        |
| Brick/Masonry/Tile          | 57.12                           | Vulcan Carroll Canyon Landfill and Recycle Site  
10051 Black Mountain Road  
San Diego, CA 92126  
(100% diversion)      | 57.12                     | --                        |
| Cardboard                   | 5.71                            | EDCO Station Transfer and Buy Back Center  
8184 Commercial Street  
La Mesa, CA 91942  
(70% diversion)       | 3.99                      | 1.71                      |
| Carpet, Padding/Foam        | 2.85                            | DFS Flooring  
10178 Willow Creek Road  
San Diego, CA 92131  
(100% diversion)      | 2.85                      | --                        |
| Drywall                     | 39.98                           | EDCO Station Transfer and Buy Back Center  
8184 Commercial Street  
La Mesa, CA 91942  
(70% diversion)       | 27.99                     | 11.99                     |
| Landscape Debris            | 5.71                            | Miramar Greenery  
5180 Convoy Street  
San Diego, CA 92111  
(100% diversion)      | 5.71                      | --                        |
| Mixed C&D Debris            | 171.37                          | Otay C&D/Inert Debris Processing Facility  
1700 Maxwell Road  
Chula Vista, CA 91913  
(76% diversion)      | 128.53                    | 42.84                     |
| Roofing Materials           | 2.85                            | LEED Recycling  
8725 Miramar Place  
San Diego, CA 92121  
(100% diversion)      | 2.85                      | --                        |
| Scrap Metal                 | 14.28                           | EDCO Station Transfer and Buy Back Center  
8184 Commercial Street  
La Mesa, CA 91942  
(70% diversion)       | 9.99                      | 4.28                      |
| Unpainted Wood & Pallets    | 68.54                           | Miramar Greenery  
5180 Convoy Street  
San Diego, CA 92111  
(100% diversion)      | 68.54                     | --                        |
| Garbage/Trash               | 2.85                            | Miramar Landfill  
5180 Convoy Street  
San Diego, CA 92111  
(0% diversion)      | --                        | 2.85                      |
| **TOTAL**                   | 571.17                          |                                                                        | 504.65                    | 63.67                      |

Construction debris will be separated onsite into material-specific containers, corresponding to the materials types in Table 4, to facilitate reuse and recycling and to increase the efficiency of waste
reclamation. As shown in Table 4, 88 percent of the construction materials generated are targeted for diversion.

7.0 OCCUPANCY PHASE

While the construction phase for the 9455 Towne Centre Drive Redevelopment Project occurs as a one-time waste generation event as construction of the project proceeds, tenant/owner occupancy requires an on-going plan to manage waste disposal to meet the waste reduction goals established by the City and State. The 9455 Towne Centre Drive Redevelopment Project will comply with the City’s Recycling Ordinance.

In accord with the City’s Conservation Element, 9455 Towne Centre Drive Redevelopment Project seeks to reduce its “environmental footprint” through a variety of sustainable design features. Additionally, the project will be seeking a LEED core and shell “Silver” rating. The project would comply with the Uniform Building Code (UBC) and Title 24 requirements for building materials and insulation in order to reduce unnecessary loss of energy.

The project proposes to utilize portions of areas which are designated for landscaping or other softscape for Low Impact Development (LID) storm water treatment. Landscaped areas would be used in the treatment of runoff prior to entering the storm drain system. These LID BMPs would also function to slow down site runoff, increase times of concentration, improve downstream hydrologic conditions, and treat storm water as compared to the existing condition. These BMPs are extremely effective in creating a low impact site design concerning storm water management.

As a result of the recommended site design, source control measures, and treatment control measures, water quality exceedances are not anticipated, and pollutants are not expected within project runoff that would adversely affect beneficial uses in downstream receiving waters. The project would implement controls designed to limit discharges to the appropriate standard. The project complies with the requirements of the State Regional Water Quality Control Board concerning coverage under the General Construction Permit.

The proposed Landscape Concept Plan includes the use of indigenous and native material, whenever possible. Planting is intended to be a connecting device linking the various pieces of the project and design style. The Landscape Concept Plan emphasizes a garden setting, where plant material would be used to help define spaces, screen objectionable views, encourage circulation paths, highlight entry points, and provide softness and scale to the architecture. Evergreen, deciduous, and flowering material are proposed throughout the project. Located adjacent to open space slopes, the perimeter planting is proposed as a blend of native material and native friendly fire safe planting.

Circulation throughout the project is accentuated with a hierarchy of landscape treatments. Enhanced paving at major intersections and nodes is proposed to signify pedestrian/vehicle interaction areas. Vehicle nodes with small medians are proposed to help slow the traffic flow, as well as break up long linear drives. Street trees are proposed to define vehicle/pedestrian spaces and to provide shade and scale to the street scene. Entry points would be highlighted with decorative trellis work and enhanced plantings.
7.1 Implementation

The following two tables express the anticipated refuse and recyclable storage requirements based on Table 142-08C of the City of San Diego Municipal Code.

Table 5
Minimum Exterior and Recyclable Material Storage Areas for the 9455 Towne Centre Drive Redevelopment Project

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Gross Floor Area</th>
<th>Minimum Refuse Storage Area (square feet)</th>
<th>Minimum Recyclable Material Storage Area (square feet)</th>
<th>Total Minimum Storage Area (square feet)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Industrial Office</td>
<td>150,000 sq. ft.</td>
<td>288</td>
<td>288</td>
<td>576</td>
</tr>
<tr>
<td>TOTAL</td>
<td>150,000 sq. ft.</td>
<td>288</td>
<td>288</td>
<td>576</td>
</tr>
</tbody>
</table>

The 9455 Towne Centre Drive Redevelopment Project project would be required to provide a minimum of 288 square feet refuse storage area and a minimum of 288 square feet recyclable material storage area for a total of approximately 576 square feet minimum exterior refuse and recyclable material storage area.

As shown in Table 6, Estimated Solid Waste Generation from the 9455 Towne Centre Drive Redevelopment Project – Occupancy Phase, during occupancy, the expected generated waste per year from the 9455 Towne Centre Drive Redevelopment Project when fully occupied would be approximately 255 tons.

Table 6
Estimated Solid Waste Generation from the 9455 Towne Centre Drive Redevelopment Project – Occupancy Phase

<table>
<thead>
<tr>
<th>Use</th>
<th>Intensity (square feet)</th>
<th>Waste Generation Rate (tons/year/sq. ft.)</th>
<th>Estimated Waste Generated (tons/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Industrial Office</td>
<td>150,000</td>
<td>0.0017</td>
<td>255</td>
</tr>
<tr>
<td>TOTAL</td>
<td></td>
<td></td>
<td>255</td>
</tr>
</tbody>
</table>

On-site recycling services shall be provided to all tenants within 9455 Towne Centre Drive Redevelopment Project. Tenants within 9455 Towne Centre Drive Redevelopment Project that receive solid waste collection service shall participate in a recycling program by separating recyclable materials from other solid waste and depositing the recyclable materials in the recycling container provided for the occupants. Recycling services are required by Section 66.0707 of the City of San Diego Land Development Code. Based on current requirements, these services shall include the following:

- Collection of recyclable materials as frequently as necessary to meet demand;
- Collection of plastic bottles and jars, paper, newspaper, metal containers, cardboard, and glass containers;
- Collection of other recyclable materials for which markets exist, such as scrap metal, wood pallets;
- Collection of food waste for recycling by composting, where available (prior to issuance of building and occupancy permits, the project proponent will meet with representatives from ESD to ensure that their educational materials and haulers can comply with the requirements for this service);
- Use of recycling receptacles or containers which comply with the standards in the Container...
and Signage Guidelines established by the City of San Diego Environmental Services Department;

- Designated recycling collection and storage areas; and
- Signage on all recycling receptacles, containers, chutes, and/or enclosures which complies with the standards described in the Container and Signage Guidelines established by the City of San Diego Environmental Services Department.

As required by Section 66.0707 of the City of San Diego Land Development Code, the building management or other designated personnel shall ensure that occupants are educated about the recycling services as follows:

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

### 7.2 Landscaping and Green Waste Recycling

Plant material selection will be guided by the macro-and micro-climate characteristics of the project site and surrounding region to encourage long-term sustainability without the excessive use of water pesticides and fertilizers. Irrigation of these areas, where practical, will utilize reclaimed water applied via low precipitation rate spray heads, drip emitters, or other highly efficient systems. Landscape maintenance would include the collection of green waste and disposal of green waste at recycling centers that accept green waste. This will help further reduce the waste generated by developments within the 9455 Towne Centre Drive Redevelopment Project during the occupancy phases.

### 8.0 CONCLUSION

The City of San Diego Development Services Department is requiring that this Preliminary WMP be prepared and submitted to the City of San Diego’s ESD. Since the project is in the design phase, this is only a preliminary plan, which specifies the intent to meet the requirements of PRC 939 and City ordinances. Prior to the issuance of any permits for construction within each neighborhood of 9455 Towne Centre Drive Redevelopment Project, final reports will be submitted to ESD for final review and approval.

This Preliminary WMP will be implemented to the fullest degree of accuracy and efficiency. Additionally, the project will be required to adhere to City ordinances, including the Construction and Demolition Debris Diversion Deposit Program, the City’s Recycling Ordinance, and the Refuse and Recyclable Materials Storages Regulations. The WMP plan for the 9455 Towne Centre Drive Redevelopment Project project is designed to implement and adhere to all city ordinance and regulations with regards to waste management. The measures in the WMP would ensure that impacts are mitigated to below a level of significance.
Prior to the issuance of any grading or construction permits, the Solid Waste Coordinator will ensure ESD’s attendance at a precon. The Solid Waste Coordinator will ensure that 1) the proposed approach to contractor education is approved, 2) the written specifications for base materials, concrete pavers, decomposed granite, and mulch, is approved, and 3) that the ESD inspector approves the separate waste containers, signage, and hauling contract(s) for the following materials:

- Asphalt/concrete
- Brick/masonry/Tile
- Cardboard
- Carpet/padding/foam
- Drywall
- Landscape debris
- Mixed C&D debris
- Scrap metal
- UNTREATED woodwaste
- Refuse

The project will attempt to achieve 88 percent of construction waste to be source reduced and/or recycled. Diversion activities during occupancy will achieve 40 percent diversion, and the project will incorporate several measures above and beyond the requirements of local ordinance.

- First, the project exceeds ordinance requirements and even the State waste reduction target during construction.
- Second, the project includes landscaping that will reduce yardwaste, and will provide transportation to a composting facility for the yard waste that is produced. The project proponent will ensure that ESD reviews the landscaping plans and hauling contract for the facility to verify that waste reduction goals are met.

These measures ensure that the waste generated by the project will be properly managed and that solid waste services will not be impacted.

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

I. Prior to Permit Issuance or Bid opening/Bid award
   A. LDR Plan check
      1. Prior to the issuance of any construction permit, including but is not limited to, demolition, grading, building or any other construction permit, the Assistant Deputy Director (ADD) Environmental Designee shall verify that all the requirements of the Refuse & Recyclable Materials Storage Regulations and all of the requirements of the waste management plan are shown and noted on the appropriate construction documents. All requirements, notes and graphics shall be in substantial conformance with the conditions and exhibits of the associated discretionary approval.
2. The construction documents shall include a waste management plan that addresses the following information and elements for demolition, construction, and occupancy phases of the project as applicable:
   a. tons of waste anticipated to be generated,
   b. material type of waste to be generated,
   c. source separation techniques for waste generated,
   d. how materials will be reused on site,
   e. name and location of recycling, reuse, or landfill facilities where waste will be taken if not reused on site,
   f. a "buy recycled" program,
   g. how the project will aim to reduce the generation of construction/demolition debris,
   h. a plan of how waste reduction and recycling goals will be communicated to subcontractors,
   i. a time line for each of the three main phases of the project as stated above,
   j. a list of required progress and final inspections by City staff

3. The plan shall strive for a goal of 75 percent waste reduction.

4. The plan shall include specific performance measures to be assessed upon the completion of the project to measure success in achieving waste minimization goals.

5. The Plan shall include notes requiring the Permittee to notify Mitigation Monitoring Coordination (MMC) and ESD when inspections are needed. The permittee shall arrange for progress inspections, and a final inspection, as specified in the plan and shall contact both MMC and ESD to perform these periodic site visits during construction to inspect the progress of the project's waste diversion efforts.

Notification shall be sent to:

MMC Environmental Review Specialist
Development Service Department
9601 Ridgehaven Court
Ste. 320, MS 1102 B
San Diego, California 92123
(619) 980 7122

Environmental Services Department (ESD)
9601 Ridgehaven Court
Ste. 320, MS 1103 B
San Diego, California 92123 1636
(858) 627-3303

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

II. Prior to Start of Construction
   A. Pre Construction Meeting
      1. Demolition Permit - Prior to issuance of any demolition permit, the permittee shall be responsible to obtain written verification from MMC indicating that the permittee has
arranged a preconstruction meeting to coordinate the implementation of the MMRP. The Precon Meeting that shall include: the Construction Manager, Demolition/Building/Grading Contractor; MMC; and ESD and the Building Inspector (BI) and/or the Resident Engineer (RE) (whichever is applicable) to verify that implementation of the waste management plan shall be performed in compliance with the plan approved by LDR and the San Diego ESD, to ensure that impacts to solid waste facilities are mitigated to below a level of significance.

2. At the Precon Meeting, The Permittee shall submit three (3) reduced copies (11" x 17") of the approved waste management plan, to MMC (2) and ESD (1).

3. Prior to the start of demolition, the Permittee/the Construction Manager shall submit a construction/demolition schedule to MMC and ESD.

B. Grading and Building Permit - Prior to issuance of any grading or building permit, the permittee shall be responsible to arrange a preconstruction meeting to coordinate the implementation of the MMRP. The Precon Meeting that shall include: the Construction Manager, Building/Grading Contractor; MMC; and ESD and the Building Inspector and/or the RE (whichever is applicable) to verify that implementation of the waste management plan shall be performed in compliance with the plan approved by LDR and the San Diego ESD, to ensure that impacts to solid waste facilities are mitigated to below a level of significance.

1. At the Precon Meeting, the Permittee shall submit reduced copies (11" x 17") of the approved waste management plan, the RE, BI, MMC, and ESD.

2. Prior to the start of construction, the Permittee/Construction Manager shall submit a construction schedule to the RE, BI, MMC, and ESD.

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

IV. Post Construction
A. Within 30 days after the completion of the implementation of the Mitigation Monitoring Reporting Program (MMRP), for any demolition or construction permit, a final results report shall be submitted to both MMC and ESD for review and approval to the satisfaction of the City. MMC will coordinate the approval with ESD and issue the approval notification.

B. Prior to final clearance of any demolition permit, issuance of any grading or building permit, release of the grading bond and/or issuance of any Certificate of Occupancy, the permittee shall provide documentation to the ADD of LDR, that the waste management plan has been effectively implemented.
June 24, 2016

Ms. Lauren Schwartz Ross, Esq.
Counsel
Kilroy Realty, L.P.
12200 W. Olympic Boulevard, Suite 200
Los Angeles, CA 90064

Subject: Biological Resources Due Diligence Assessment for APN 348-020-68

Dear Ms. Ross:

At your request, HELIX Environmental Planning, Inc. (HELIX) has prepared this letter to document the results of a site reconnaissance and assessment of existing conditions for an approximately 2.8-acre parcel (Assessor’s Parcel Number [APN] 348-020-68), located in the City of San Diego (City), California (Property). This assessment is based on a review of existing information and site visits conducted by HELIX biologist Jason Kurnow in May 2016.

INTRODUCTION

Property Location

The Property (APN 348-020-68) is located in the University City community of the City, west of Interstate 805 and east of Shoreline Drive (Figures 1 and 2). The site is situated on the Pueblo Lands of the San Diego land grant on U.S. Geological Survey La Jolla 7.5-minute quadrangle map (Figure 3). The Property is located within the boundaries of the adopted City Multiple Species Conservation Program (MSCP) Subarea Plan, with the eastern portion also located within the Multi-Habitat Planning Area (MHPA; [Figure 4]). This site is located outside of the Coastal Zone.

No project is proposed at this time. The Property is being evaluated for the presence of sensitive biological resources and its overall biological value.
METHODS

Prior to the field investigation, HELIX conducted an in-house database search for sensitive biological resources known to occur within the site vicinity. HELIX also reviewed existing documentation prepared for the Property and surrounding area as part of the Golden Triangle Business Center Project.

HELIX biologist Jason Kurnow conducted an initial site reconnaissance on May 18, 2016, with the goal of noting the general biological conditions on site, assessing the potential for sensitive species and habitats to occur, and qualifying the overall biological value of the site. A 1"=75' scale aerial photograph was used as a guide during the site visit. An inspection for rare plants was also conducted as part of the site reconnaissance. A follow-up survey was performed on May 19, 2016, to confirm the identity of a sensitive plant that occurs on the site. However, no focused animal surveys or jurisdictional delineation field work was conducted. This letter report is based only on a review of existing data and the site reconnaissance surveys.

Nomenclature for this report is taken from the City’s Land Development Code Biology Guidelines (City of San Diego 2012) and Oberbauer (2008) for vegetation communities. Plants are named according to The Jepson Manual Higher Plants of California (Jepson Flora Project (eds.) 2016). Reptiles and amphibians are named according to Collins and Taggart (2002). Birds are named according to the American Ornithologists’ Union (2015). Mammals are named according to Baker, et al. (2003).

EXISTING CONDITIONS SUMMARY

Topography and Soils

The site consists of a series of gentle slopes that flatten out towards the southern site boundary. Elevation on site ranges from approximately 237 to 278 feet above mean sea level. Soils on site consist of Huerhuero loam, 15 to 30 percent slopes, eroded, Olivenhain cobbly loam, 30 to 50 percent slopes, and Riverwash (USDA 2016).

Vegetation Communities/Habitat Types

The site contains five vegetation communities: mule fat scrub, coast live oak woodland, Diegan coastal sage scrub (including disturbed), non-native grassland, and disturbed habitat.

Mule Fat Scrub

Mule fat scrub is a depauperate, shrubby riparian scrub community dominated by mule fat and interspersed with small willows. This vegetation community occurs along intermittent stream channels with a fairly coarse substrate and moderate depth to the water table. This early seral community is maintained by frequent flooding, the absence of which would lead to a cottonwood or sycamore dominated riparian woodland or forest.
Mule fat scrub is considered sensitive and is classified as a wetland by the City. Based on the City’s Land Development Code Biology Guidelines (City of San Diego 2012) impacts to wetlands should be avoided. When contiguous with better quality riparian habitat, mule fat scrub has the potential to support several sensitive plant and animal species in the region, most of which are considered covered species under the City’s MSCP, including the federally endangered least Bell’s vireo (*Vireo bellii pusillus*; LBVI).

**Coast Live Oak Woodland**

Coast live oak woodland is an open-to-dense evergreen woodland or forest community, dominated by coast live oak (*Quercus agrifolia*) that may reach a height of 35-80 feet. The shrub layer consists of toyon (*Heteromeles arbutifolia*), Mexican elderberry (*Sambucus mexicana*), spreading snowberry (*Symphoricarpus mollis*), fuchsia-flowered gooseberry (*Ribes speciosum*), and poison oak (*Toxicodendron diversilobum*). A dense herbaceous understory is dominated by miner’s lettuce (*Claytonia perfoliata var. perfoliata*) and chickweed (*Stellaria media*). This community occurs along the coastal foothills of the Peninsular Ranges; typically, on north-facing slopes and shaded ravines (Holland 1986). Coast live oak woodland can be further described as either open or dense. The differences between the coast live oak woodland and coast live oak forest are physiognomic rather than compositional.

Coast live oak woodland is considered sensitive and an MSCP Tier I habitat type by the City. This habitat type is known to support a number of sensitive plant and animal species in the region, most of which are considered covered species under the City’s MSCP.

**Diegan Coastal Sage Scrub**

Coastal sage scrub is one of the two major shrub types that occur in southern California, occupying xeric sites characterized by shallow soils (the other is chaparral). Four distinct coastal sage scrub geographical associations (northern, central, Venturan, and Diegan) are recognized along the California coast. Diegan coastal sage scrub (DCSS) may be dominated by a variety of species depending upon soil type, slope, and aspect. Typical species found within DCSS include California sagebrush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum* ssp. *fasciculatum*), laurel sumac (*Malosma laurina*), lemonadeberry (*Rhus integrifolia*), and black sage (*Salvia mellifera*). Disturbed DCSS contains many of the same shrub species as undisturbed DCSS but is sparser and has a higher proportion of non-native annual species.

Both disturbed and undisturbed DCSS occurs on the Property. DCSS (including disturbed) is considered sensitive and an MSCP Tier II habitat type by the City. This habitat type is known to support a number of sensitive plant and animal species in the region, most of which are considered covered species under the City’s MSCP, including the federally threatened coastal California gnatcatcher (*Polioptila californica californica*; CAGN).
Non-native Grassland

Non-native grassland is a dense to sparse cover of annual grasses, often associated with numerous species of showy-flowered native annual forbs. This association occurs on gradual slopes with deep, fine-textured, usually clay soils. Characteristic species include oats (*Avena* sp.), red brome (*Bromus rubens*), ripgut (*B. diandrus*), ryegrass (*Lolium* sp.), and mustard (*Brassica* sp.). Most of the annual introduced species that comprise the majority of species and biomass within the non-native grassland originated from the Mediterranean region, an area with a long history of agriculture and a climate similar to California. These two factors, in addition to intensive grazing and agricultural practices in conjunction with severe droughts, contributed to the successful invasion and establishment of these species and the replacement of native grasslands with non-native grassland.

Non-native grassland is considered sensitive and an MSCP Tier IIB habitat type by the City. Although this habitat type does not typically support sensitive species, it can support certain sensitive plants and does serve as foraging habitat for raptors.

Disturbed Habitat

Disturbed habitat includes land cleared of vegetation (e.g., dirt roads), land containing a preponderance of non-native plant species such as ornamentals or ruderal exotic species that take advantage of disturbance (previously cleared or abandoned landscaping), or land showing signs of past or present animal usage that removes any capability of providing viable habitat.

Disturbed habitat is not considered sensitive and is designated as an MSCP Tier IV habitat type by the City.

Sensitive Plant and Animal Species

Sensitive Plant Species

One sensitive plant species, Nuttall’s scrub oaks (*Quercus dumosa*), was observed during the site reconnaissance. Five individuals were observed in the northwestern portion of the site (Figure 4). This species has a California Rare Plant Rank of 1B.1. However, it is not a federally, or state listed species. No other sensitive plant species were observed, but 12 other plants have been previously documented from within 1.0 mile of the Property. The likelihood that these other sensitive plant species occur on site is considered low because: 1) they occur in habitat types not occurring on site, 2) are larger species that would have been observed during site reconnaissance, or 3) their blooming period occurs within the timeframe of the site reconnaissance and would likely have been observed. Plant rankings are based on the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB) Special Animals List (January 2016a) and Special Vascular Plants, Bryophytes and Lichens List (January 2016b).
Sensitive Animal Species

No sensitive animal species observed, or detected during the site reconnaissance. Four sensitive animal species have been previously documented from within 1.0 mile of the Property. These four species include the federally endangered San Diego fairy shrimp (*Branchinecta sandiegonensis*), state species of concern orange-throated whiptail (*Chemidophorus hyperythrus ssp. beldingi*), federally threatened CAGN, and California state species of concern San Diego desert woodrat (*Neotoma lepida intermedia*). The federally endangered LBVI has been documented within 5.0 miles of the site. All five species, with the exception of the San Diego desert woodrat, are MSCP covered species. Of the five species, three have the potential to occur on the Property due to the presence of suitable habitat: orange-throated whiptail, CAGN, and San Diego desert woodrat.

Nesting Birds

The site contains vegetation that provides suitable habitat for nesting birds protected under the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFG Code).

Jurisdictional Waters and Wetlands

A formal jurisdictional delineation was not conducted for the site; however, a preliminary assessment of potential jurisdictional waters and wetlands was conducted during the site reconnaissance. The assessment identified two, unnamed, ephemeral drainage features ranging from approximately 1-3 feet in width (Figure 4). These features are tributary to Rose Creek, which outfalls into Mission Bay; a traditional navigable water (TNW). One of the drainages starts on site and makes its way south/southeast before connecting with the second drainage feature. The second drainage feature originates north of the site, making its way south. It changes course once it reaches a dirt path, continuing to the west/southwest. Both drainage features show signs of a bed and bank, and scour marks. Based on the information available at this time, the drainage features would be considered non-wetland waters of the U.S. subject to the regulatory jurisdiction of the U.S. Army Corps of Engineers (USACE); non-wetland waters of the State subject to the regulatory jurisdiction of the Regional Water Quality Control Board (RWQCB); and unvegetated streambed subject to the regulatory jurisdiction of the CDFW. Based on the adjacency of the coast live oak woodland to riparian/wetland habitat (mule fat scrub), all, or a portion of the coast live oak woodland could be considered jurisdictional by CDFW and/or wetlands regulated as Environmentally Sensitive Lands (ESL) by the City.

BIOLOGICAL VALUE

The project site contains biological resources that are considered sensitive by the City and/or regulatory agencies. Although the site is relatively small at 2.8 acres, it supports resources that are of local and regional importance, which contributes to the overall value of the land from a biological resources perspective. These resources are explained in further detail below.
Multi-Habitat Planning Area

The eastern portion of the site is located within a MHPA, while the western portion of the site is surrounded by a MHPA to the north, east, and south (Figure 4). The MHPA overlay adds biological value to the site because it has been identified as a high priority area for the regional habitat preserve assemblage in the City. Lands within the MHPA overlay that are contiguous with large blocks of open space and support sensitive species, ESL habitat types, and jurisdictional resources are of highest priority to the City for preservation.

Conclusion: Although small in size at 2.8 acres, the Property is contiguous with large habitat blocks and supports habitat for sensitive species, ESL, and jurisdictional resources, all of which combine to increase its biological value.

Sensitive Plant and Animal Species

Sensitive Plant Species

The Property supports a single sensitive plant species, Nuttall’s scrub oak (Figure 5). Five individuals were observed within the coast live oak woodland habitat in the MHPA portion of the site. Other sensitive plants are not likely to occur based on the information gathered at the time of the survey. To conclusively determine the presence/absence of sensitive species within the Property, focused surveys should be conducted during the appropriate time of year, which is typically between late February and early May.

Conclusion: The presence of coast live oak woodland and Nuttall’s scrub oak within the MHPA overlay increases the biological value of the Property.

Sensitive Animal Species

Although none were observed during the May 2016 survey, the Property supports suitable habitat for several sensitive animal species known to occur in the region, including suitable habitat within the MHPA overlay for the federally threatened CAGN and federally endangered LBVI.

CAGN has a moderate potential to occur within the DCSS on the Property, including DCSS within the MHPA overlay, based on the habitat quality, connectivity with suitable habitat off site, and documentation of the species with 1.0 mile of the site.

LBVI has a low potential to occur within the mule fat scrub within the MHPA overlay and on the Property itself, but has a much higher potential to occur in the better quality habitat located off site to the south. Although no records of the species occur within 1.0 mile of the site, there have been records within 5.0 miles and it is likely that the species occupies riparian habitat throughout Rose Creek.
Several other, non-listed, sensitive animal species have potential to occur on the site, including the San Diego wood rat and orange-throated whiptail, which have been reported within 1.0 mile. To conclusively determine the presence/absence of sensitive species within the Property, focused surveys should be conducted during the appropriate time of year, which for CAGN is generally mid-March through June.

**Conclusion:** The presence of suitable habitat for sensitive animal species, including the federally threatened CAGN within the MHPA overlay, increases the biological value of the Property.

**Sensitive Vegetation Communities/Habitat Types**

The City’s MSCP and Biology Guidelines identify sensitive habitat as ESL and assign a “tier” value to each upland sensitive habitat type. Wetlands and Tier I habitat types are the most sensitive, and Tier IV types are the least sensitive. Sensitive vegetation communities occurring on site consist of mule fat scrub, coast live oak woodland, DCSS, and non-native grassland as shown in Table 1 and Figure 5.

<table>
<thead>
<tr>
<th>VEGETATION COMMUNITY</th>
<th>TIER</th>
<th>ACREAGE¹</th>
<th>ALL OR PARTIALLY WITHIN MHPA?</th>
<th>OCCUPIED BY SPECIES?</th>
<th>SUITABLE HABITAT FOR SPECIES?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wetlands</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mule Fat Scrub</td>
<td>Wetland</td>
<td>0.14</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Uplands</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Coast Live Oak Woodland</td>
<td>I²</td>
<td>0.5</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
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<tr>
<td>Diegan Coastal Sage Scrub</td>
<td>II</td>
<td>1.1</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Non-native Grassland</td>
<td>IIIb</td>
<td>0.6</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
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<tr>
<td><strong>TOTAL</strong></td>
<td></td>
<td><strong>2.34</strong></td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
</tbody>
</table>

¹ Rounded to the nearest tenth of an acre for uplands and hundredth of an acre for wetlands.

² Portions of coast live oak woodland may support wetland conditions, and therefore, would be considered a wetland category as opposed to a Tier I category.

As summarized in Table 1, a majority of the site (2.34 acres) contains sensitive vegetation communities that support occupied and/or suitable habitat for sensitive species. These habitats occur either within or adjacent to MHPA overlay areas.

**Conclusion:** The presence of ESL that is also occupied and suitable for sensitive species within the MHPA overlay increases the biological value of the site.
Jurisdictional Waters and Wetlands

Reaches of two unnamed, ephemeral tributaries to Rose Creek traverse portions of the site (Figure 5). Based on the information available at this time, the drainage features would be considered jurisdictional by the USACE, RWQCB, and CDFW. The portions of the drainage features that traverse mule fat scrub and coast live oak woodland could also be considered ESL wetland by the City. Both drainage features occur within the MHPA.

Conclusion: The presence of jurisdictional waters and wetlands that are tributary to Rose Creek increases the biological value of the site.

We appreciate the opportunity to provide you with this due diligence assessment. Please do not hesitate to contact me or Karl Osmundson at (619) 462-1515 if you have any questions or if we can be of further assistance.

Sincerely,

Jason Kurnow
Senior Scientist

Enclosures:

- Figure 1  Regional Location Map
- Figure 2  Project Vicinity (Aerial Photograph)
- Figure 3  Project Vicinity (USGS Topography)
- Figure 4  Multi-Habitat Planning Area
- Figure 5  Vegetation and Sensitive Resources
REFERENCES


City of San Diego. 1997. Multiple Species Conservation Program; City of San Diego MSCP Subarea Plan. March.


Regional Location Map

ROSE CANYON PROPERTY (APN 348-020-68)

Figure 1
Project Vicinity (Aerial Photograph)

ROSE CANYON PROPERTY (APN 348-020-68)
Project Vicinity (USGS Topography)

ROSE CANYON PROPERTY (APN 348-020-68)

Figure 3
Vegetation Community and Sensitive Resources

ROSE CANYON PROPERTY (APN 348-020-68)

Figure 5
G. Progress Guide and General Plan

This Plan includes a consistency analysis, describing how the Plan conforms to the General Plan. This analysis is in the General Plan Consistency Element of this Plan.

### TABLE 1
UNIVERSITY COMMUNITY PLAN LAND USE SUMMARY

<table>
<thead>
<tr>
<th>Category</th>
<th>Use Description</th>
<th>Acreage</th>
<th>Dwelling Units</th>
</tr>
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<tbody>
<tr>
<td>Residential</td>
<td></td>
<td>(1,562)</td>
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<tr>
<td></td>
<td>5-10 Units/Acre</td>
<td>718</td>
<td>6,018</td>
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<td></td>
<td>10-15 Units/Acre</td>
<td>100</td>
<td>1,446</td>
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<td>15-30 Units/Acre</td>
<td>547</td>
<td>12,245</td>
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<td>30-45 Units/Acre</td>
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<td>Commercial</td>
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</tr>
<tr>
<td></td>
<td>Community</td>
<td>30</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Regional</td>
<td>103</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Visitor</td>
<td>46</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Office</td>
<td>178</td>
<td></td>
</tr>
<tr>
<td>Life Sciences/Research</td>
<td>(700697)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Scientific Research</td>
<td>633</td>
<td>630</td>
</tr>
<tr>
<td></td>
<td>Hospitals</td>
<td>66</td>
<td></td>
</tr>
<tr>
<td>Industrial</td>
<td></td>
<td>(580)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Restricted</td>
<td>347</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Business/Industrial Park</td>
<td>233</td>
<td></td>
</tr>
<tr>
<td>Parks/Open Space</td>
<td>(2,8082,811)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Neighborhood</td>
<td>34 usable</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Community</td>
<td>29 usable</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Sports Complex</td>
<td>21 usable</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Joint Use</td>
<td>18 usable</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Golf</td>
<td>359</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Resource-Based</td>
<td>394</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Open Space</td>
<td>1,161</td>
<td>1,119</td>
</tr>
<tr>
<td></td>
<td>State Park</td>
<td>837</td>
<td></td>
</tr>
<tr>
<td>Schools</td>
<td>(1,233)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Elementary</td>
<td>61</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Junior High</td>
<td>28</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Senior High</td>
<td>40</td>
<td></td>
</tr>
<tr>
<td></td>
<td>UCSD</td>
<td>1,104</td>
<td></td>
</tr>
<tr>
<td>Public Facilities</td>
<td>(36)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other</td>
<td>Freeway Rights-of-Way, etc.</td>
<td>(1,201)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Total Community</td>
<td>8,512</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Total Community Dwelling Units</td>
<td>30,417</td>
<td></td>
</tr>
</tbody>
</table>
### TABLE 3
LAND USE AND DEVELOPMENT INTENSITY

Any changes to this table for properties in the Coastal Zone Shall require an amendment to the Local Coastal Program

<table>
<thead>
<tr>
<th>Subarea/Name</th>
<th>Gross Acres</th>
<th>Land Use and Development Intensity</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Salk Institute</td>
<td>26.88</td>
<td>500,000 SF- Scientific Research</td>
</tr>
<tr>
<td>2. UCSD</td>
<td>915.00</td>
<td>UCSD Long Range Development Plan (110,000 ADT)</td>
</tr>
<tr>
<td>3. VA Hospital</td>
<td>29.95</td>
<td>725 Beds</td>
</tr>
<tr>
<td>4. Scripps Memorial Hospital Medical Offices</td>
<td>41.38</td>
<td>682 Beds 31,500 SF - Scientific Research 793,580 SF - Medical Office</td>
</tr>
<tr>
<td>5. Scripps Clinic</td>
<td>25.17</td>
<td>320 Beds 567,000 SF - Scientific Research 404,000 SF - Medical Office 52,000 SF - Aerobics Center</td>
</tr>
<tr>
<td>6. Torrey Pines Golf Course/ City Park/State Reserve</td>
<td>728.05(1)</td>
<td></td>
</tr>
<tr>
<td>7. Sheraton Hotel Lodge at Torrey Pines</td>
<td>11.38</td>
<td>400 Rooms - Hotel</td>
</tr>
<tr>
<td>8. Torrey Pines State Reserve</td>
<td>233.92</td>
<td>175 Rooms - Hotel</td>
</tr>
<tr>
<td>9. Chevron</td>
<td>303.60</td>
<td>20,000 SF/AC – Scientific Research (2)</td>
</tr>
<tr>
<td>Scallop Nuclear (Gentry)</td>
<td>56.41</td>
<td>Existing or approved development, Exceptions: Spin Physics – 550,000 SF</td>
</tr>
<tr>
<td>Torrey Pines Science Park</td>
<td>145.74</td>
<td>Lot 10B (2.7 AC) – 15,500 SF/AC</td>
</tr>
<tr>
<td>Signal/Hutton</td>
<td>25.79</td>
<td></td>
</tr>
<tr>
<td>Torrey Pines Business and Research Park</td>
<td>15.89</td>
<td>23,000 SF/AC (2) Scientific Research</td>
</tr>
<tr>
<td>La Jolla Cancer Research</td>
<td>4.87</td>
<td>Open Space</td>
</tr>
<tr>
<td>State Park</td>
<td>14.25</td>
<td></td>
</tr>
<tr>
<td>10. Campus Point</td>
<td>158.78</td>
<td>Existing or approved development, Exceptions: IV AC and SAIC – 30,000 SF/AC (3) and Lot 7 (3.6 AC) – 18,000 SF/AC – Scientific Research 25.00 Open Space</td>
</tr>
<tr>
<td>11. Private Ownership</td>
<td>55.93</td>
<td>18,000 SF/AC – Scientific Research (4)</td>
</tr>
<tr>
<td>City Ownership</td>
<td>47.48</td>
<td>(Development intensity transferred from Subarea 37 for all of Subarea 11)</td>
</tr>
<tr>
<td>12. Eastgate Technology Park (PID) (4a)</td>
<td>218.50</td>
<td>2,423,212 2,356,990 SF - Scientific Research (5)</td>
</tr>
</tbody>
</table>

(1) A minimum of 187 public parking spaces is to be retained on public land for golf course uses; in addition, at the adjacent Lodge at Torrey Pines, there are 40 parking spaces reserved daily for golfers and 94 parking spaces reserved during tournaments.

(2) Chevron, Scallop Nuclear, and La Jolla Cancer Research Foundation shall be required to mitigate their peak-hour trip generation rate to a level equal to or less than that which would be generated by a project of 18,000 SF/AC. Mitigation shall be achieved through a Transportation System Management (TSM) program to be approved by the City Council and the California Coastal Commission as a Local Coastal Program amendment. The proposed TSM program must specify the maximum development intensity of the project site and include supported findings. This Plan encourages the development of these parcels through a master.

(3) SAIC and IVAC shall be required to mitigate their peak-hour trip generation rate to a level equal to or less than that which would be generated by a project of 18,000 SF/AC. Mitigation shall be achieved through a Transportation System management (TSM) program to be approved by the City Council.

(4) This Plan encourages the development of this subarea through a master plan

(4a) ADTs from Irvine Company owned parcels 343-122-40-43, 45-52, & 60-64 Subarea 12 (PID 90-0892) have been shifted to La Jolla Centre III Subarea 29 APN 345-012-10.

(5) ADTs from City owned Open Space parcel 348-020-68-00 in Subarea 37 have been shifted to Lot 9 of Eastgate Technology Park Subarea 12.
TABLE 3 (continued)
LAND USE AND DEVELOPMENT INTENSITY

Any changes to this table for properties in the Coastal Zone Shall require an amendment to the Local Coastal Program

<table>
<thead>
<tr>
<th>Subarea/Name</th>
<th>Gross Acres</th>
<th>Land Use and Development Intensity</th>
</tr>
</thead>
<tbody>
<tr>
<td>35. La Jolla Centre I (PCD)</td>
<td>3.17</td>
<td>143,400 SF- Office</td>
</tr>
<tr>
<td>36. Neighborhood Park</td>
<td>30.00</td>
<td></td>
</tr>
<tr>
<td>37. City Ownership</td>
<td>87,4056.5</td>
<td>18,000 SF/AC – Scientific Research</td>
</tr>
<tr>
<td>Nobel Research Park</td>
<td>14.45</td>
<td>18,000 SF/AC – Scientific Research</td>
</tr>
<tr>
<td>Open Space</td>
<td>42.60</td>
<td>Development approval not to be granted until 1995 for Subareas 36 and 37. Development intensity for this area is reduced by transfer to Subarea 11 of 18,000 SF/AC)</td>
</tr>
<tr>
<td>38. Towne Centre Apartments (PRD)</td>
<td>23.79</td>
<td>256 DU</td>
</tr>
<tr>
<td>39. City Ownership</td>
<td>7 – 8</td>
<td>30 DU/A</td>
</tr>
<tr>
<td>40. La Jolla Crossroads</td>
<td>33.80</td>
<td>33.8 AC- Residential</td>
</tr>
<tr>
<td>41. Renaissance La Jolla (PRD &amp; PCD)</td>
<td>112.96</td>
<td>2,500 DU</td>
</tr>
<tr>
<td>Open Space Easement</td>
<td>15.06</td>
<td>50,000 SF – Neighborhood Commercial</td>
</tr>
<tr>
<td>42. La Jolla Gateway (PCD)</td>
<td>75.35</td>
<td>396,305 SF - Office</td>
</tr>
<tr>
<td>Congregation Beth Israel</td>
<td>75.35</td>
<td>2,165 SF – Chapel</td>
</tr>
<tr>
<td>43. University Towne Centre</td>
<td>75.35</td>
<td>62,931 SF – Sanctuary/Temple School</td>
</tr>
<tr>
<td>44. Vista La Jolla/University Pines</td>
<td>12.26</td>
<td>257 DU</td>
</tr>
<tr>
<td>45. Vista La Jolla</td>
<td>14.84</td>
<td>56 DU</td>
</tr>
<tr>
<td>46. Nobel Terrace (PRD)</td>
<td>41.05</td>
<td>716 DU</td>
</tr>
<tr>
<td>47. Costa Verde Specific Plan</td>
<td>54.00</td>
<td>178,000 SF – Neighborhood/Community Commercial</td>
</tr>
<tr>
<td>48. La Jolla Highlands Torrey Heights La Jolla Pines Village Green</td>
<td>17.42</td>
<td>474 DU</td>
</tr>
<tr>
<td>49. Genesee Highlands Unit 2</td>
<td>17.87</td>
<td>246 DU</td>
</tr>
<tr>
<td>50. Genesee Highlands Unit 3</td>
<td>8.61</td>
<td>211 DU</td>
</tr>
<tr>
<td>Open Space Easement</td>
<td>13.60</td>
<td></td>
</tr>
</tbody>
</table>

(7a) ADTs from Irvine Company owned parcels 343-122-40-43, 45-52, & 60-64, Subarea 12 (PID 90-0892); 345-012-09, Subarea 35 (PCD 83-0131); 345-011-15, 16-, & 23, Subarea 42 (PCD 820797); and 345-120-17, Subarea 67 (PRD 96-0638) have been shifted to La Jolla Centre III Subarea 29, APN 345-012-10.
(7b) ADTs from Irvine Company owned parcel 345-012-09, Subarea 35 (PCD 83-0131) have been shifted to La Jolla Centre III Subarea 29, APN 345-012-10.
(7c) ADTs from Irvine Company owned parcels 345-011-15 & 16, Subarea 42 (PCD 82-0707) have been shifted to La Jolla Centre III Subarea 29, APN 345-012-10. Congregation Beth Israel not a part of ADT Shift.
(8) After 558 ADT transferred from Subarea 47 to Subarea 40, La Jolla Crossroads, 2,602 unused ADT remain with Costa Verde Specific Plan Area.
(9) This property is subject to an approved Master Planned Development Permit (MPDP), which permits adjustment to the levels of retail and residential development (up to 300 units) within the intensity envelope for the property defined by the MPDP.
(10) ADTs from City owned Open Space parcel 348-020-68-00 have been shifted to Eastgate Technology Park Subarea 12, Lot 9.