

## 4.12 PUBLIC SERVICES AND UTILITIES

### 4.12.1 Introduction

This section provides an analysis of utilities and service systems for the proposed project. Existing condition information presented in this section is based on coordination with potentially affected utility and public service agencies. Specific references are identified within the subsection for each respective issue. This section addresses the following public service systems and utilities (the service provider is noted in parentheses):<sup>1</sup>

- Fire Protection (City of Del Mar Fire Department [DMFD] and San Diego Fire-Rescue Department)
- Law Enforcement (San Diego County Sheriff's Department)
- Schools (Del Mar Union School District and San Dieguito Unified School District)
- Public Transportation (North County Transit District's [NCTD] BREEZE Bus)
- Water/Wastewater (City of Del Mar Department of Public Works and City of San Diego Water Department)
- Solid Waste (Miramar Landfill and Sycamore Landfill)

### 4.12.2 Existing Environmental Setting

#### Fire Protection.

**City of Del Mar Fire Department.** The majority of the Del Mar Fairgrounds site is served by the DMFD, which provides fire protection services to the City of Del Mar. In addition, the DMFD has mutual aid agreements with neighboring departments, including San Diego Fire-Rescue Department, Encinitas Fire Department, Solana Beach Fire Department, and Rancho Santa Fe Fire Protection District.<sup>2</sup> Under these agreements, the nearest fire companies respond to fire or medical emergencies regardless of jurisdictional boundaries. Furthermore, in 2003 the DMFD entered into a contract with the City of Solana Beach for fire chief services, and both agencies/cities share the services of both a Fire Chief and a Deputy Fire Chief for both day-to-day management and for emergency responses to major incidents.

The DMFD consists of one fire station (fire station 1), which is the closest station to the proposed project site,<sup>3</sup> located on the Del Mar Fairgrounds at 2200 Jimmy Durante Boulevard. The DMFD is responsible for a variety of services such as fire suppression and protection, emergency medical services, vehicle accident response, rescue, and hazardous material incident response. Also, the DMFD works on a contractual basis with the Rancho Santa Fe Regional Dispatch Agency for 24-

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<sup>1</sup> Since the project site is located within the Cities of San Diego and Del Mar, more than one service provider may serve the site.

<sup>2</sup> Ibid.

<sup>3</sup> Service letter from Dismas Abelman, Deputy Fire Chief/Fire Marshall at City of Solana Beach and City of Del Mar, to Dustin Fuller at 22nd DAA/Del Mar Fairgrounds on May 7, 2008.

hour dispatch services.<sup>1</sup> The DMFD serves approximately 5,000 full-time residents living in a 2.5 square-mile (sq mi) area, as well as over 3 million annual visitors to the Del Mar Fairgrounds. The DMFD consists of nine full-time staff (three captains, three fire engineers, and three firefighters) and a number of part-time student firefighter/paramedics. The minimum on-duty staff is four persons.<sup>2</sup>

The DMFD response time goal is to respond to 90 percent of emergency calls within a response time of less than seven minutes after it has been dispatched. The staffing goals are to respond with a minimum of three people on all incidents. Currently, the DMFD is meeting both goals.<sup>3</sup>

**San Diego Fire-Rescue Department.** Portions of the Del Mar Fairgrounds are also served by the San Diego Fire-Rescue Department. The City of San Diego Fire-Rescue Department provides fire protection and emergency services throughout the City of San Diego.<sup>4</sup> The San Diego Fire Department consists of 1,279 members (1,153 uniformed personnel and 126 civilian personnel) who serve approximately 1.3 million residents living in a 331 sq mi area.

As mentioned above, the City of San Diego has a mutual aid agreement with the fire departments from the Cities of Del Mar, Solana Beach, and unincorporated Rancho Santa Fe. The City of San Diego Fire-Rescue Department can respond to the project site in approximately 5.5 minutes, with the nearest station located at 13077 Hartfield Avenue.

When the City of Solana Beach Fire Department provides services to the Fairgrounds on behalf of San Diego Fire-Rescue Department, response time is approximately 3.6 minutes. The City of Solana Beach Fire Department is located at 500 Lomas Santa Fe, is staffed 24 hours a day, and operates with two fire crews (three personnel on each of two apparatus). Six firefighters and two paramedics are available to respond from the Station daily. These crews function together on a shift basis with a total of 18 line firefighters and 6 private paramedics. Four of the line firefighters are also paramedics.<sup>5</sup>

**Police Protection.** The 22nd District Agricultural Association (DAA) has a program that provides security services at the Fairgrounds. The security program staff consists of a Chief of Security, Deputy Chief of Security, two Lead Guards, and nine Security Guards. The 22nd DAA security program manages all aspects of security, including public safety (fire and law enforcement services), medical services, and traffic and parking programs. Medical services include public access defibrillators, advanced and basic life support, ambulances, paramedics, emergency medical technicians, and registered nurses.

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<sup>1</sup> City of Del Mar, Fire Department. Web site: <http://www.delmar.ca.us/City/Government/FireDept.htm>, accessed May 8, 2008.

<sup>2</sup> Ibid.

<sup>3</sup> Service letter from Dismas Abelman, Deputy Fire Chief/Fire Marshall at City of Solana Beach and City of Del Mar, to Dustin Fuller at 22nd DAA/Del Mar Fairgrounds on May 7, 2008.

<sup>4</sup> City of San Diego Fire-Rescue Department. Web site: <http://www.sandiego.gov/fireandems/about/overview.shtml>, accessed April 14, 2008.

<sup>5</sup> City of Solana Beach, Public Safety. Web site: <http://www.ci.solana-beach.ca.us/ContentPage.asp?ContentID=144>, accessed on April 18, 2008.

The San Diego County Sheriff's Department is the chief law enforcement agency in the County of San Diego and provides contract law enforcement services to the City of Del Mar including the Fairgrounds.

**San Diego County Sheriff.** The San Diego County Sheriff's Department provides contract law enforcement services for the Cities of Del Mar, Encinitas, Imperial Beach, Lemon Grove, Poway, San Marcos, Santee, Solana Beach, and Vista in addition to patrol services and necessary law enforcement investigative services in the unincorporated areas of the County of San Diego, an area of approximately 4,200 sq mi. The San Diego County Sheriff's Department is comprised of approximately 4,000 employees (both sworn officers and professional support staff).

Services provided to the project site are rendered by deputy sheriffs and professional staff from the Encinitas Sheriff's Station, located in the City of Encinitas at 175 North El Camino Real, approximately 5.3 miles (mi) from the project site. The Encinitas Sheriff's Station serves the Cities of Encinitas, Del Mar, and Solana Beach, the unincorporated communities of Rancho Santa Fe, Fairbanks Ranch, and Rancho Cielo, and the San Onofre-Camp Pendleton coastal area. The City of Del Mar contracts with the San Diego County Sheriff's Department for one 24-hour patrol deputy and one traffic unit for approximately 8 hours per day. The Encinitas Sheriff's Station response time to emergency calls originating from the City of Del Mar is on average 15 minutes, ranging from approximately 5 minutes for Priority 1 calls and 26 minutes for Priority 4 calls. Over the last four years, the number of service calls to the project site has decreased according to the San Diego County Sheriff's Department Records.

**Schools.** The project site is within the Del Mar Union School District for grades K–6. For grades 7–12, the project site is within the San Dieguito Union High School District.

**Del Mar Union School District.** The Del Mar Union School District consists of eight elementary schools; however, students near the project site may elect to attend the Del Mar Hills Academy of Arts and Sciences, located at 14085 Mango Drive in Del Mar, or the Del Mar Heights School, located at 1355 Boquita Drive in Del Mar. As shown in Table 4.12.A, in the 2006/2007 and the 2007/2008 school years, enrollment was 406 and 375 students for the Del Mar Hills Academy of Arts and Sciences and 444 and 437 students for the Del Mar Heights School. The overall capacity for the Del Mar Hills Academy of Arts and Sciences and the Del Mar Heights School is 590 and 775, respectively; therefore, the school enrollments are currently within capacity. The Del Mar Union School District indicated in the service letter to the 22nd DAA that there are currently no plans for a new school in the district.

**Table 4.12.A: School Enrollment and Capacity**

School Name	Location	2006–2007 Enrollment	2007–2008 Enrollment	Capacity
Del Mar Hills Academy of Arts and Sciences (Grades K–6)	14085 Mango Dr. Del Mar, CA 92014-0640	406	375	590
Del Mar Heights School	13555 Boquita Dr. Del Mar, CA 92014	444	437	775
Earl Warren Middle School (Grades 7–8)	155 Stevens St. Solana Beach, CA 92075-2038	570	607	872
Torrey Pines High School (Grades 9–12)	3710 Del Mar Heights Rd. San Diego, CA 92130	2,866	2,658	3,145

Source: California Department of Education-Educational Demographics Unit (2008) and School Questionnaires. San Dieguito Union High School District Student Housing Capacity. Attachment A. 7100/AR-1. January 2006.

**San Dieguito Union High School District.** The San Dieguito Union High School District serves the Cities of Del Mar, Solana Beach, and Encinitas for students at the middle school and high school level (grades 7–12). The San Dieguito Union High School District consists of four middle schools and six high schools (including one alternative and one continuation high school). As shown in Table 4.12.A, Earl Warren Middle School and Torrey Pines High School, both of which serve the project site, are currently within capacity. The San Dieguito Union High School District indicated in the service letter that there are currently no plans for a new school in the district.

**Transit Services.**

**NCTD.** The Del Mar Fairgrounds is located within the service territory of the NCTD. The NCTD geographical service area encompasses 1,020 sq mi of northern San Diego County, extending from Del Mar in the south, northeasterly to Escondido, north to the Riverside County line, and west to the Orange County line. The area includes the unincorporated communities of Fallbrook and Ramona as well as the Marine Corps Base Camp Pendleton. Other Cities in the service area include Solana Beach, Encinitas, Carlsbad, Oceanside, Vista, and San Marcos. BREEZE routes run as far south as University Towne Center in La Jolla (Route 101); the City of San Clemente in the north (Route 395), and the City of Ramona in the east (Route 386). The total population of the NCTD service area is more than 800,000.

NCTD moves more than 12 million passengers annually by providing public transportation for northern San Diego County. NCTD transit services include the BREEZE bus system, the COASTER commuter rail service, and the new SPRINTER light rail line.

NCTD’s BREEZE bus (Route 101) provides 180 daily trips that serve the project site. There are approximately 160 existing BREEZE bus stops.<sup>1</sup> The BREEZE bus uses an alternative fuel-based path and reduces particulate emissions in the bus fleet by 69 percent. Currently, more than half of

<sup>1</sup> Information received via telephone conversation from Kurt Luhrsen, Principal Planner at North County Transit District, to Elise McCollister at LSA Associates, Inc. on May 8, 2008.

the BREEZE buses operate using environmentally friendly compressed natural gas (CNG). Most BREEZE routes operate every 30 or 60 minutes.<sup>1</sup>

NCTD also operates 20 COASTER trains linking northern San Diego County with downtown San Diego and other various transit hubs every weekday and 10 trains on Saturdays (the COASTER does not operate regular service on Sundays). Each COASTER train is at least five cars in length, holding more than 1,000 passengers per train. In July, 2008 NCTD began running select peak commute trains with six cars to increase passenger capacity and comfort. Currently, the Solana Beach Station is the closest COASTER Station to the Del Mar Fairgrounds.

NCTD's Sprinter, is a light rail, self-propelled transit system providing an east-to-west mobility link along a 22 mi route through the Cities of Escondido, San Marcos, Vista, and Oceanside. The Sprinter reaches a maximum speed of 55 miles per hour (mph) and services 15 stations along Highway 78 with an average of 3–5 minutes between stations. The Sprinter is fueled by diesel multiple units (DMUs), thus reducing emissions compared to other heavy commuter rail options in the area (i.e., COASTER and Amtrak). The Sprinter also provides connections to the COASTER, BREEZE, Amtrak, Metrolink, and Greyhound transit providers.

**Amtrak.** Amtrak, also known as the National Railroad Passenger Corporation, operates a nationwide rail network serving more than 500 destinations in 46 states on 21,000 mi of routes with nearly 18,000 employees. Amtrak's Pacific Surfliner route serves the area near the Del Mar Fairgrounds. The Pacific Surfliner offers 12 daily round-trip journeys between San Diego and Los Angeles, and between Santa Barbara and San Diego. The Pacific Surfliner is the second-busiest route in the nation, with a total ridership of approximately 2.9 million in fiscal year (FY) 2008. Currently, the Solana Beach Station is the closest Amtrak Station to the Del Mar Fairgrounds. The Solana Beach Station is one of the 25 busiest stations in the Country. In FY 2008, total ridership at the Solana Beach Station was 448,081.

**Water.** The City of San Diego Water Department serves more than 1.2 million people populating more than 200 sq mi of developed land, including the project site east of Jimmy Durante Boulevard.<sup>2</sup> During a normal year, approximately 10–20 percent of the City of San Diego's water supply is made up of local rainfall captured in one of the local reservoirs. The City of San Diego currently purchases up to 90 percent of its water from San Diego County Water Authority (Water Authority), a wholesale agency that provides imported water to 23 member agencies. The Water Authority, in turn, purchases water from the Metropolitan Water District of Southern California (Metropolitan), which is comprised of 26 public water agencies and is the largest in the nation. Water supplied by the Water Authority and Metropolitan comes from two separate sources: the Colorado River (from Lake Havasu) via a 242 mi long aqueduct and northern California from the State Water Project via the California Aqueduct (444 mi long).<sup>3</sup>

<sup>1</sup> North County Transit District. Web site: <http://www.gonctd.com/>, accessed May 8, 2008.

<sup>2</sup> City of San Diego. Web site: <http://www.sandiego.gov/water/gen-info/overview.shtml>, accessed June 2, 2008.

<sup>3</sup> Ibid.

The City of San Diego Water Department treats and delivers more than 200,000 acre-feet per year (afy) of water to its residents. Its service area is generally located within the south central portion of San Diego County and is approximately 330 sq mi. The water system consists of nine raw water storage facilities: Barrett, El Capitan, Hodges, Miramar, Morena, Murray, Otay, San Vicente, and Sutherland, eight of which are directly connected to water treatment operations. These reservoirs capture local rainwater and runoff to supply up to 20 percent of the City's water.

The City of San Diego operates three water treatment plants at the following locations: Miramar, Alvarado and Otay Reservoirs. The project site is served by the Miramar treatment plant, which supplies water directly to the project site east of Jimmy Durante Boulevard via a 12-inch-diameter water main along Jimmy Durante Boulevard from Via De La Valle south to the existing recreational vehicle (RV) parking lot. A looped 10-inch-diameter water main system also exists surrounding the Hilton Hotel and commercial lots fronting Via De La Valle. A dead-end 8-inch-diameter water main serves the current recreation facilities south of the RV parking lot.<sup>1</sup> The City of San Diego does not anticipate expanding water facilities at this time.

The City of San Diego has been receiving water from the Water Authority since 1947, and during the last 20 years the City of San Diego has purchased between 100,000 and 228,000 afy. For FY 2005, water purchases totaled approximately 211,000 af, representing 87 percent of the City of San Diego's total water needs.<sup>2</sup>

The City of San Diego also conveys potable water to the City of Del Mar. Per the agreement between the City of San Diego and Del Mar, the City of San Diego takes deliveries of water, which Del Mar purchases from the Water Authority, through the Second Aqueduct Connection at Miramar.<sup>3</sup> This water is then treated at the City of San Diego's Miramar Water Treatment Plant and transported along certain points to Del Mar.<sup>4</sup> Table 4.12.B provides past and current water sales uses along with projected demand for potable water.

**Table 4.12.B: Water Purchased from the City of San Diego by the City of Del Mar (afy)**

Potable Water Distributed	2000	2005	2010	2015	2020	2025	2030
Del Mar	1,556	1,301	1,417	1,494	1,533	1,572	1,561

Source: City of San Diego, *The 2005 City of San Diego Urban Water Management Plan*. 2005.  
 afy = acre feet per year

The City of Del Mar Water Department supplies potable water to the project site west of Jimmy Durante Boulevard via: (1) an 8-inch line near the first driveway on Jimmy Durante Boulevard, south of Via De La Valle; (2) a 10-inch line just north of the main gate on Jimmy Durante Boulevard; and (3) a 10-inch line across Jimmy Durante Boulevard from the fire station. Water is used for drinking

<sup>1</sup> E-mail communication from Chris Gascon, P.E., Associate Civil Engineer, City of San Diego Water Department, to Marc Cass (dated April 25, 2008).

<sup>2</sup> City of San Diego, *The 2005 City of San Diego Urban Water Management Plan*. 2005.

<sup>3</sup> Ibid.

<sup>4</sup> Ibid.

(potable), washing, flushing, recreational purposes, and other domestic consumption. Currently, the City of Del Mar is utilizing its full capacity contracted from the City of San Diego and does not anticipate expanding water facilities at this time.<sup>1</sup>

The Water Authority, from which the City of Del Mar purchases its water, completed a Regional Water Facilities Master Plan (RWFMP) process in 2004. The RWFMP defines the regional facilities needed to meet water demands within the Water Authority's service area through 2030. The Water Authority examined the changing water supply and demand forecast patterns using a probabilistic approach to facilities planning. A computer model analyzed various facility options under a range of supply and demand scenarios. This modeling resulted in an assessment of the reliability of the system measured in terms of the probability, frequency, and magnitude of water shortages for each facility option. The water supply and capital improvements currently under way and planned for the future are designed to serve the region's needs through 2030. They include new pipelines and pump stations to convey the water, a water treatment facility, improvements to the existing water delivery system, the All-American and Coachella Canal Lining Projects, and projects to increase storage capacity throughout the County.<sup>2</sup>

On April 29, 1998, the Water Authority, from which the City of Del Mar purchases its water, signed an agreement with the Imperial Irrigation District (IID) for the long-term transfer of conserved Colorado River water to San Diego County. Deliveries into San Diego County from the transfer began in 2003 with an initial transfer of 10,000 af. The Water Authority received 20,000 af in 2004, 30,000 af in 2005, and 40,000 af in 2006. The quantities will increase annually to 200,000 af by 2021, then remain fixed for the duration of the transfer agreement. The initial term of the Transfer Agreement is 45 years, with a provision that either agency may extend the agreement for an additional 30-year term. During dry years, when water availability is low, the conserved water will be transferred under IID's Colorado River rights, which are among the most senior in the Lower Colorado River Basin. Without the protection of these rights, the Water Authority could suffer delivery cutbacks. In recognition of the value of such reliability, the 1998 contract required the Water Authority to pay a premium on transferred water under defined regional shortage circumstances. The Water Authority believes that adequate documentation is available to demonstrate the availability of water to meet projected demand through 2030, including projected demand for the City of Del Mar.<sup>3</sup>

The Water Authority has identified and is exploring a number of sources of future water supply, in addition to MWD and IID, including promoting the use of recycled water, desalinating brackish groundwater, developing groundwater storage programs, seawater desalination, and expanding water conservation. The Water Authority tracks and ranks four levels of drought conditions from Level 1-Drought Watch to Level 4-Drought Emergency. Currently the Water Authority is at Level 1-Drought Watch, although it states that the effects of several consecutive "dry years" in California could lead to water allocation by water supply agencies.<sup>4</sup>

<sup>1</sup> Letter from David Scherer, Director of Public Works, City of Del Mar, to Dustin Fuller at 22nd DAA/Del Mar Fairgrounds (dated March 20, 2008).

<sup>2</sup> San Diego County Water Authority. 2005 *Updated Urban Water Management Plan*. April 2007.

<sup>3</sup> Ibid.

<sup>4</sup> <http://www.sdcwa.org> accessed February 12, 2009.

**Wastewater.** The City of San Diego Metropolitan Wastewater Department (MWW) provides regional wastewater treatment and disposal services for the City of San Diego and 15 Cities and districts (called Participating Agencies) from a 450-square-mile area, a population of over 2.2 million. The Participating Agencies include the Cities of Chula Vista, Coronado, Del Mar, El Cajon, Imperial Beach, La Mesa, National City, Poway, the Lemon Grove Sanitation District, the Otay Water District, the Padre Dam Municipal Water District, and the County of San Diego (including Lakeside/Alpine, Spring Valley, Wintergardens, and East Otay Mesa). The Wastewater Collection Division of MWW is responsible for the collection and conveyance of wastewater from residences and businesses in the City of San Diego. The Wastewater Collection Division consists of 84 pump stations, 2,894 mi of City sewer lines, and over 250,000 sewer connections. An average of 180 million gallons of wastewater is treated daily.

Facilities for the City of San Diego MWW are located throughout the City. The Point Loma Wastewater Treatment Plant is the primary MWW facility, processing approximately 175 million gallons a day of wastewater with a treatment capacity of 240 million gallons per day. Collected and treated wastewater is released from the Point Loma facility into the Pacific Ocean via a 12-foot (ft) diameter gravity-feed line that extends 4.5 mi off the coast of Point Loma, 320 ft below the surface.

The proposed project site is located in two sewer tributary areas operated by MWW. The first tributary area is located on the east side of Jimmy Durante Boulevard, and the City of San Diego has 8- to 12-inch sewer pipes located near Jimmy Durante Boulevard, Via De La Valle, and Valley Avenue where sewage flow is transported via the City of San Diego's sewer pipes to the City of Solana Beach sewer system. The pipes' design capacity varies from 0.25 million gallons per day (mgd) to 0.75 mgd. The current peak wet weather flows are at approximately 40 percent of the capacity.<sup>1</sup>

The second tributary area is located on the west side of Jimmy Durante Boulevard; sewage flow is transported from the project site via City of Del Mar's sewer system to the City of San Diego (the City of Del Mar has a contractual agreement with the City of San Diego for treatment and transportation of sewage flow, and the 22nd DAA and the City of Del Mar have a Memorandum of Understanding [MOU] pertaining to the treatment and transportation of sewage flow). The project site's sewer system west of Jimmy Durante Boulevard is pumped to the City of Del Mar's 21st Street Pump Station through an existing 8-inch force main (plans to replace this existing forcemain have been approved, and the replacement was completed in spring 2009). From the 21st Street Pump Station, the wastewater is discharged through a 14-inch force main owned and operated by the City of Del Mar and connects to the City of San Diego MWW's 54-inch Carmel Valley Trunk Sewer that flows to Pump Station 65. From Pump Station 65, the wastewater eventually gets treated and discharged to the Pacific Ocean via the Point Loma Wastewater Treatment Plant.

Under wet weather conditions, the trunk sewer currently operates at approximately 45 percent of capacity, but Pump Station 65 currently operates near full capacity.<sup>2</sup> The City of Del Mar has a contractual limit of 0.821 mgd for the average annual daily flow (ADF) to the MWW system. Most recently, from 2004 to 2006, the average ADF from the 22nd DAA to the City of Del Mar was 0.111 mgd. As mentioned above, the City of Del Mar and the 22nd DAA have an MOU that officially

<sup>1</sup> Letter from Guann Hwang, Senior Civil Engineer at City of San Diego, to Dustin Fuller at 22nd DAA/Del Mar Fairgrounds (dated April 25, 2008).

<sup>2</sup> Ibid.

sets peak flow per minute, peak daily flow, and average daily flow. The MOU (December 2008) stipulates that the 22nd DAA's Peak Flow not exceed any of the following levels:

- A. Flow of 630 gallons per minute (gpm) as averaged over a 15-minute time frame.
- B. Peak daily flow of 792,000 gallons per day (gpd).
- C. Average daily flow of 156,000 gpd.

### **Solid Waste.**

**Landfills and Landfill Capacity.** The following landfills accommodate the County of San Diego's waste disposal needs: Ramona Landfill, Borrego Springs Landfill, Otay Landfill, West Miramar Sanitary Landfill, Sycamore Sanitary Landfill, San Onofre Landfill, and Las Pulgas Landfill (California Integrated Waste Management Board [CIWMB] California Solid Waste Information System 2006). In May of 2002, it was estimated that 62.9 million tons of existing permitted in-County physical capacity remained, excluding the San Onofre and Las Pulgas Landfills, which only accept military waste.

Physical capacity represents the volume available to be filled and is different from the rate at which materials may enter. The volume available is governed by design limits. The number of years of physical disposal space is affected by the rate of fill, which is limited by daily or annual permitted disposal tonnages. Physical capacity can be modified by amending the permits that regulate design limits.

A gradual increase in annual generation and disposal in the County of San Diego is projected. Based on the 1995–2001 disposal tonnages, imported and exported tonnages, and a 50 percent diversion rate by the year 2005, it is estimated that San Diego County jurisdictions will need to accommodate disposal capacity for over 5.6 million tons of solid waste in 2017. If no additional in-County physical capacity is added, it is estimated that the County could potentially run out of physical capacity in approximately 2016.<sup>1</sup>

A small expansion is proposed for the Sycamore Sanitary Landfill that would add 116.6 million tons of disposal capacity in the County. There is also a proposed landfill (Gregory Canyon Landfill) that, if approved, would provide an additional 33.4 million tons of capacity. The additional capacity of both proposals would provide an excess of 140.8 million tons of capacity in 2017. If opened, the proposed Gregory Canyon Landfill combined with the expansion of the Sycamore Sanitary Landfill would provide adequate capacity until 2020.<sup>2</sup> The opening date of the Gregory Canyon Landfill remains uncertain because of public opposition to the facility.

In addition to in-County waste disposal, every year there is some solid waste exported from San Diego County. The amount of export tonnage has fluctuated from year to year. In 1995, the region exported 14 percent of its waste compared to 4 percent in 2001. If the Sycamore Canyon Landfill expansion and the proposed Gregory Canyon Landfill are approved with proposed

<sup>1</sup> County of San Diego Department of Public Works. San Diego Integrated Waste Management Plan Countywide Siting Element. 2005 5-year Revision Final. 2005.

<sup>2</sup> Ibid.

increases in daily permitted disposal tonnages, the region may need to export 7.2 percent of its waste in 2017 to meet the region's disposal need of 6.1 million tons. If neither landfill proposal is approved and without using other waste reduction strategies, the region may need to export up to 55 percent of its waste in 2017. San Diego jurisdictions currently send waste to, or have utilized in the past, several out-of-County facilities. The continued availability of out-of-County disposal sites is not known, and other disposal sites may become available in the future.<sup>1</sup>

Based on their proximity to the Fairgrounds, the West Miramar Sanitary Landfill and the Sycamore Sanitary Landfill would be most likely to serve the project site.

**West Miramar Sanitary Landfill.** The project site is served by the City of San Diego's West Miramar Sanitary Landfill, located at 5180 Convoy Street in the City of San Diego. The West Miramar Sanitary Landfill has been in operation since 1983 as a solid waste facility, with more than 1.4 million tons per year (tpy) of waste disposed at the landfill. As of 2008, the landfill was near capacity and scheduled to close between 2011 and 2013; however, in early 2009 the City of San Diego requested and received a 20 ft height increase at the West Miramar Sanitary Landfill. The height increase, approved by the landowner of the landfill (United States Navy), may extend the landfill capacity up to five years (until between 2014 and 2018) if approved by appropriate regulatory agencies. Without the proposed height increase, the permitted maximum disposal rate is 8,000 tons per day (tpd), and the total estimated permitted capacity is approximately 56.5 million cubic yards (cy), with the total estimated capacity used in 2006 at approximately 42.8 million cy (75.8 percent).<sup>2</sup> In 2000, the City of Del Mar sent approximately 13,000 tpy of waste to the facility, and the City of San Diego sent 1.5 million tpy of waste to the facility. The West Miramar Sanitary Landfill also receives waste from the Cities of Carlsbad, Chula Vista, Coronado, El Cajon, Encinitas, Escondido, Imperial Beach, La Mesa, Lemon Grove, National City, Oceanside, Poway, San Marcos, Santee, Solana Beach, and Vista, as well as the unincorporated areas of San Diego County.

**Sycamore Sanitary Landfill.** The Sycamore Landfill is a permitted Class III privately owned landfill serving San Diego County, located at 8514 Mast Boulevard in the City of Santee. The Sycamore Landfill is permitted to receive 3,965 tpd of waste and has a remaining capacity (as of 2005) of approximately 47,124,462 cy. The Landfill's estimated closing date is 2030.

**Waste Generation.** During reporting year 2006, the last year for which information is available, both the City of Del Mar and the City of San Diego were in full compliance with waste diversion

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<sup>1</sup> County of San Diego Department of Public Works. San Diego Integrated Waste Management Plan Countywide Siting Element. 2005 5-year Revision Final. 2005.

<sup>2</sup> CIWMB (2008). Active Landfill Profile for West Miramar Sanitary Landfill. Web site: <http://www.ciwmb.ca.gov/Profiles/Facility/Landfill/LFPProfile1.asp?COID=37&FACID=37-AA-0020>, accessed June 2, 2008.

goals set by the State of California pursuant of Assembly Bill (AB) 75 at 56 and 55 percent, respectively.<sup>1</sup>

The Del Mar Fairgrounds achieved a 91.3 percent (over 41 million pounds) diversion rate for its solid waste in 2005 and has set an ultimate goal of “zero waste.” The Del Mar Fairgrounds started its recycling program in 1985 by recycling paper waste. Since that time staff has expanded the program to include recovery of more than 19 different materials, including food discards, beverage containers, and cardboard. The Fairgrounds sorts and separates all recyclables at on-site facilities. The Del Mar Fairgrounds Resource Conservation Policy prohibits the use of polystyrene containers by food providers on site.<sup>2</sup>

#### 4.12.3 Regulatory Setting

##### Water Supply.

**The Safe Drinking Water Act.** The Safe Drinking Water Act (SDWA) implemented by the United States Environmental Protection Agency (EPA) is the primary federal regulation controlling drinking water quality. It was originally implemented in 1974, with significant revisions in 1986. The SDWA originally set standards for 83 individual constituents, including pesticides, trihalomethanes, arsenic, selenium, radionuclides, nitrates, toxic metals, bacteria, viruses, and pathogens. The 1996 amendment to the SDWA made some significant changes, most of which resulted in more stringent application of controls. The amended SDWA also adopted a more rigorous schedule for amending the Disinfectants/Disinfection Byproducts Rule and the Enhanced Surface Water Treatment Rule, both of which took effect in 1998. Federal permits relating to water utilities or infrastructure would be required only if the proposed project resulted in United States Army Corps of Engineers (Corps) involvement or United States Fish and Wildlife Service (USFWS) involvement if issues concerning the project resulted in construction of new infrastructure (such as pipelines, utility lines, etc.) in sensitive habitat areas.

The California Department of Health Services (DHS) is responsible for overseeing the quality of water once it is in storage and distribution systems. DHS oversees the self-monitoring and reporting program implemented by all water purveyors, performs inspections, and assists with financing water system improvements for the purpose of providing safer and more reliable service.

**Urban Water Management Planning Act.** In 2001, the California State legislature enacted two pieces of legislation, Senate Bills (SB) 221 and 610, which aim to make certain that water supply will be available for new development.

Under SB 610 (Costa), local water purveyors (with over 3,000 connections or 3,000 af of service) are required to prepare Urban Water Management Plans, which must include information on groundwater management, and must update them every five years. Noncompliance results in

<sup>1</sup> CIWMB. Jurisdictional Diversion Rate Summary–Del Mar and San Diego. Web site: <http://www.ciwmb.ca.gov/Profiles/Juris/Default.asp>, accessed February 9, 2009.

<sup>2</sup> CIWMB. Del Mar Fairgrounds, California. Case Studies, accessed February 9, 2009.

removal of eligibility for Department of Water Resource funding. In addition, SB 610 requires that projects subject to the CEQA over a certain size comply with the water supply assessment procedure as detailed in Part 2.10 of the Water Code.

The second bill, SB 221 (Keuhl), serves as a “backstop” in case long-range water supply planning has not taken place. SB 221 requires any verification of “projected” water supplies to be based on entitlement contracts, capital outlay programs, and regulatory permits and approvals regarding the right to and capability of delivering the projected supply. SB 221 hinges on proof of a sufficient water supply, and the law places the initial burden of establishing that proof on the public water system. The bill prohibits a city or county from approving a tentative tract map or parcel map (or a development agreement, including land division) of more than 500 units unless there is written verification that sufficient and reliable water supply will be available prior to completion of the project.

In addition, the proposed project is required to comply with CCR Title 20 and Title 24. Title 24 establishes energy conservation standards for new construction, including residential and nonresidential buildings, and also includes building standards such as the California Plumbing Code (Part 5), which promotes water conservation. CCR Title 20 addresses Public Utilities and Energy and includes appliance efficiency standards that promote water conservation.

## **Solid Waste.**

**California Integrated Waste Management Act of 1989.** The California Integrated Waste Management Act of 1989 (Public Resource Code [PRC] Division 30), enacted through AB 939 and modified by subsequent legislation, required all California cities and counties to implement programs to reduce, recycle, and compost at least 50 percent of wastes by 2000 (PRC Section 41780). The State determines compliance with this mandate to “divert” 50 percent of generated waste (which includes both disposed and diverted waste) through a complex formula. This formula requires cities and counties to conduct empirical studies to establish a “base year” waste generation rate against which future diversion is measured. The actual determination of the diversion rate in subsequent years is arrived at through deduction, not direction measurement: instead of calculating the amount of material recycled and composted, the city or county tracks the amount of material disposed at landfills, then subtracts the disposed amount from the base year amount. The difference is assumed to be diverted (PRC 41780.2).

**Senate Bill 1374.** SB 1374 requires that the annual report submitted to CIWMB include a summary of the progress made in diversion of construction and demolition waste materials. In addition, SB 1374 required that the CIWMB adopt a model ordinance suitable for adoption by any local agency to require 50–75 percent diversion of construction and demolition waste materials from landfills by March 1, 2004. Local jurisdictions are not required to adopt their own construction and demolition ordinances, nor are they required to adopt CIWMB’s model by default. However, adoption of such an ordinance may be considered by CIWMB when determining whether to impose a fine on a jurisdiction that has failed to implement its Source Reduction and Recycling Element (SRRE).

For the 2005 reporting year, the biennial review for 2005/2006 has not been completed, but the preliminary data showed that the County was at an approximate 58 percent diversion rate.<sup>1</sup>

**Assembly Bill 75.** AB 75, passed in 1999, took effect on January 1, 2000. This bill added new provisions to the PRC, mandating that State agencies develop and implement an Integrated Waste Management Plan (IWMP); it also mandated that community service districts providing solid waste services report disposal and diversion information to the city, county, or regional agency in which the community service district is located.

The changes brought about by AB 75 required each State agency or large State facility (e.g., State office, department, division, board, commission, or other agency) to develop an IWMP by July 1, 2000; to divert at least 25 percent of its solid waste from landfills or transformation facilities by January 1, 2002; and to divert 50 percent by January 1, 2004. In addition to the waste diversion goals, all State agencies are required to buy recycled materials from 12 different categories, ranging from paper and plastic to paint, solvents, and lubricating oils.

**Assembly Bill 939.** State legislation (AB 939) requires that every city and county in California implement programs to recycle, reduce refuse at the source, and compost solid waste in order to achieve a 50 percent reduction in solid waste disposed of at landfills. AB 939 also requires that all cities conduct a Solid Waste Generation Study (SWGS) and prepare an SRRE. In accordance with AB 939, local agencies must submit an annual report to the CIWMB summarizing its progress in diverting solid waste disposal.

**San Diego Municipal Code, Chapter 6, Article 6, Division 7 Recycling Ordinance.** In November 2007, the City of San Diego City Council approved (effective January 1, 2008) the Recycling Ordinance, which requires recycling plastic and glass bottles and jars, paper, newspaper, metal containers, and cardboard at private residences (curbside collection services), commercial buildings, and special events requiring a City of San Diego permit.

## **Public Schools.**

**School Fees.** California Code of Regulations (CCR) Section 17620 authorizes school districts to levy a fee, charge, dedication, or other requirements against any construction of new residential, commercial, and industrial uses in their boundaries for the purpose of funding the construction of new schools or school facilities. The maximum fee amount that school districts can assess is limited by statutes provided in CCR Section 65995. Level 1 fee maximums are \$2.14/square foot (sf) for residential development and \$0.34/sf for commercial and industrial development. The California Department of Education (DOE) permits local school districts to increase these fees, subject to DOE review, and with approval of a nexus study from the school district that demonstrates that costs incurred by the school district for the provision of school facilities and

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<sup>1</sup> California Integrated Waste Management Board (CIWMB). Web site: <http://www.ciwmb.ca.gov/LGTools/MARS/DRMCMMain.asp>, accessed January 29, 2008.

services are higher than Level 1 funding provides. In such an instance, a nexus must be demonstrated in the study between the increase proposed by the local school district and the actual cost of provision of school facilities and service. The proposed project does not result in significant impacts to existing schools. The 22nd DAA is not required to pay school facility fees for projects that are not subject to local zoning and building requirements. As explained in Section 4.1, Land Use, if the 22nd DAA chooses a condominium ownership structure for a portion of the hotel, the City of Del Mar Subdivision regulations (Title 24), Zoning Code (Title 30), and Building Code (Title 23), would apply to the condominium component of the Master Plan, and therefore the requirement to pay school fees would be triggered. Also, it is not yet known whether the fire station will be owned by the 22nd DAA or by the City of Del Mar. If the 22nd DAA owns the fire station, it is anticipated that construction of the proposed fire station would be subject to local City Codes, specifically the Building and Zoning Codes. Payment of school fees may be required for the proposed fire station; however, the proposed facility is replacing an existing fire station and there would be no net increase in number of employees or residents, and therefore no increased demand for school services as a result of the proposed fire station.

#### 4.12.4 Methodology

Public service and utility providers were sent a project summary and questionnaire that requested current levels of service to the project site and information on possible constraints or impacts to their services at project build out. The impact analyses are based on responses to the questionnaires or information obtained through subsequent phone conversations with service provider representatives. In addition, a Preliminary Sewer Study (Fusco Engineering, January 2009) was prepared for the project, and a Sewer MOU (December 1, 2008) was executed between the 22nd DAA and the City of Del Mar. Both of these documents are included as appendices to the Hydrology and Water Quality Report, which is Appendix I of this EIR.

#### 4.12.5 Impact Significance Criteria

For this project, the following thresholds of significance are used. The project may have a significant adverse impact on public services and utilities if it would:

**Threshold 4.12.1      Result in substantial adverse physical impacts associated with the provision of or need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:**

- i) Fire Protection**
- ii) Police Protection**
- iii) Schools**
- iv) Parks**
- v) Transit.**

- Threshold 4.12.2** Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.
- Threshold 4.12.3** Require or result in the construction of new water or wastewater treatment or collection facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.
- Threshold 4.12.4** 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.
- Threshold 4.12.5** Exceed the water supply of existing entitlements and resources, or require new or expanded entitlements.
- Threshold 4.12.6** 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.
- Threshold 4.12.7** Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs.
- Threshold 4.12.8** Comply with federal, State, and local statutes and regulations related to solid wastes, including the California Integrated Waste Management Act of 1989, Assembly Bill (AB) 75 and AB 939.

#### **4.12.6 Project Impacts**

- Threshold 4.12.1** Result in substantial adverse physical impacts associated with the provision of or need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
- i) Fire Protection**
  - ii) Police Protection**
  - iii) Schools**
  - iv) Parks**
  - v) Transit.**

#### **Near-Term Project Impact Analysis.**

**i. Fire Protection.** The proposed near-term projects include, but are not limited to, construction of a hotel and exhibit hall structure and Health Club/Sports Training Facility, paving of the East Parking Lot, realignment of the Solana Gate entrance, and relocation of the existing fire station.

As mentioned earlier in this section, the Cities of Del Mar, Solana Beach, Encinitas, and San Diego, and unincorporated Rancho Santa Fe have entered into a mutual aid agreement in which the nearest fire companies respond to fire or medical emergencies regardless of jurisdictional boundaries. The nearest fire company to the project site currently is the DMFD. The DMFD has one station in its jurisdiction that is located on the project site. The second nearest fire is the City of Solana Beach Fire Department, with a current response time of 3.6 minutes.

Relocation of the fire station has been incorporated into the proposed project as a near-term project, and a site has been identified off site across the San Dieguito River at the corner of Jimmy Durante Boulevard and San Dieguito Drive, also know as Parcels 30/31. Relocation of the DMFD to Parcels 30/31 would allow the Fire Department to maintain similar response times to the project site and other calls within the City of Del Mar since the site would be in proximity to the existing location (less than 1,000 ft away). Parcels 30/31 are currently developed with an occupied commercial structure, parking lot, and concrete foundations, and the property is neither owned by the 22nd DAA nor the City of Del Mar. Acquisition of the property and relocation of the existing business would be required.

Implementation of Mitigation Measures 4.1.3, and 4.1.4 reduces the potentially significant impact of removing the existing fire station because the measures ensure that the existing fire station will not be demolished until the new replacement station is operational. If Mitigation Measures 4.1.3 and 4.1.4 cannot be implemented for any reason (the measures are not wholly within the control of the 22nd DAA), then the existing fire station will not be relocated off site, the existing fire station would continue to operate, and the potential adverse effect to the provision of fire protection services will be avoided. Therefore, the proposed near-term projects would have a less than significant impact on fire protection services after mitigation.

Additionally, in a response letter requesting information regarding potential impacts to fire protection services with implementation of the proposed near-term projects, the DMFD indicated that the near-term projects have the potential to result in an increase in demand for Fire Department staff, facilities, and equipment. However, in a follow-up conference call with City of Del Mar staff, Deputy Fire Chief/Fire Marshal, and the 22nd DAA on December 3, 2008, the DMFD clarified that its letter was referencing a need to replace existing equipment over time and that the near-term projects would not necessitate the acquisition of additional trucks and equipment. The DMFD relies on City funding for replacement of equipment as part of its operations/maintenance budget. The near-term projects have the potential to increase service calls to the project site; however, Fire Department determined that the proposed projects would not necessitate additional staff and equipment. Also, as previously discussed, the DMFD has entered into a mutual aid agreement with nearby fire protection agencies (Cities of San Diego, Encinitas, Solana Beach, and Rancho Santa Fe), and these agencies can assist the DMFD to respond to any increase in service calls. Therefore, the proposed near-term projects have a less than significant impact on fire protection services and equipment, and no additional mitigation is required.

**ii. Police Protection.** The proposed near-term projects include the construction of a hotel and exhibit hall structure, Health Club/Sports Training Facility, paving of the East Parking Lot, realignment of the Solana Gate entrance, etc., to improve site conditions at the Del Mar

Fairgrounds to further support the goal of the 22nd DAA to manage and promote a world-class, multiuse, public assembly facility. The 22nd DAA uniformed security guards provide an around-the-clock security patrol of the facilities and monitor the buildings and fire alarm systems. Temporary security staff provide armed and event management security and crowd management staff for the 22nd DAA so as not to increase the service call requests for the contracted 24-hour patrol deputy from the San Diego County Sheriff's Department serving the City of Del Mar. If a promoter or the event department determines that an event needs extra security, the 22nd DAA contracts with a security service.

The San Diego County Sheriff's Department will provide police protection to the project site on an as-needed basis; however, as mentioned previously, the number of service calls to the project site have decreased over the last four years. While the proposed near-term projects may increase the average annual attendance of on-site visitors and personnel, the projects would not significantly increase the daily maximum number of on-site visitors and personnel. The proposed Health Club/Sports Training Facility and hotel, as new uses on the project site, would attract people to the site; however, these projects are not anticipated to result in a high number of calls or the need for a detention cell or other capital improvement referenced in the San Diego County Sheriff's questionnaire dated February 26, 2009. In addition the near-term projects do not include the construction of residential units that would generate additional population in the area nor contribute to a need for additional sworn officers. The proposed projects are anticipated to result in an extension in response times to calls for service and additional traffic and parking issues during construction of the near-term projects.<sup>1</sup>

With continuation of the existing 22nd DAA security service, the San Diego County Sheriff's Department would be able to serve the proposed project at the same levels provided prior to project implementation, and no significant impacts to police protection are anticipated as a result of project implementation.

**iii. Schools.** The proposed near-term projects, which include the construction of a hotel and exhibit hall structure, Health Club/Sports Training Facility, paving of the East Parking Lot, realignment of the Solana Gate entrance, etc., would improve site conditions at the Del Mar Fairgrounds to further support the goal of the 22nd DAA to manage and promote a world-class, multiuse, public assembly facility.

There are currently no residential units on site, and implementation of the proposed project would not introduce such a use on the property; therefore, the project would not directly contribute students to the Del Mar Union School District or the San Dieguito Unified High School District.

Approval of the proposed project would allow for the construction of commercial uses (i.e., hotel and Health Club/Sports Training Facility), which will increase the number of employees on site. It is anticipated that the new employees will be drawn from the San Diego Association of Governments (SANDAG) region and will not necessarily cause substantial relocation of population to the City of Del Mar or the surrounding school districts. The City of Del Mar is largely built out, and housing costs are notably higher than the median for San Diego. In 2007,

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<sup>1</sup> San Diego County Sheriff Questionnaire February 26, 2009.

SANDAG reported the median household income for the City of Del Mar was \$113,407, whereas for the region, it was \$68,388<sup>1</sup>. Therefore, it is not reasonable to assume that the presence of jobs at the hotel and Health Club/Sports Training Facility will cause a substantial increase in local population to the areas adjacent to the Fairgrounds and that the increased population could impact the Del Mar Union School District or the San Dieguito Unified High School District. The net increase in the area of the exhibit halls would not contribute to additional permanent employees because the current staff would still be able to provide the required maintenance to the facility. Additional events that would be held at the proposed exhibit halls or rooftop fields would not require additional employees because the event/convention promoters would provide their own staffing.

To determine future needs for the school districts, both the Del Mar Union School District and the San Dieguito Unified High School District use student generation rates to estimate the number of students that would attend a school based on the net increase in square footage for commercial developments. Table 4.12.C shows the generation rates used by the Del Mar Union School District for students in grades K–6 for commercial and hotel developments and the generation rates used by the San Dieguito Union High School District for students in grades 7–12 for commercial developments.

**Table 4.12.C: Estimated Students Generated by the Project**

School District and Category	Generation Rate	Projected Students
Del Mar Union School District (K–6)		
Hotel/Motel <sup>1</sup>	0.0526 students/1,000 sf	13.466
Retail and Services <sup>2</sup>	0.1038 students/1,000 sf	6.228
San Dieguito Unified High School District (7–12)		
Commercial	1 student/6973 sf	45.318

<sup>1</sup> Proposed hotel would have a net increase of approximately 256,000 sf.

<sup>2</sup> Proposed Health Club/Sports Training Facility would have a net increase of approximately 60,000 sf.

sf = square feet

Using generation rates provided by the school districts, it is estimated that the proposed project would generate approximately 20 K–6 students (Del Mar Union School District) and approximately 45 7–12 students (San Dieguito Unified High School District). Based on current enrollment and capacity at the schools in both districts, it appears the schools would have sufficient capacity to serve students generated by the proposed project. Therefore, the proposed project would result in a less than significant impact related to school services and school capacity, and no mitigation is required. Furthermore, the 22nd DAA plans to own and operate the hotel and Health Club/Sports Training Facility. As a state agency, the 22nd DAA is not subject to school fees for its facilities. Although the proposed project would not result in significant impacts to existing schools, payment of school fees may be required for the proposed hotel/condominiums

<sup>1</sup> SANDAG Fast Facts [http://www.sandag.org/resources/demographics\\_and\\_other\\_data/demographics/fastfacts/delm.htm](http://www.sandag.org/resources/demographics_and_other_data/demographics/fastfacts/delm.htm), accessed February 19, 2009.

and fire station as a result of application of local zoning and building regulations. As noted above, the proposed fire station is the replacement of an existing facility.

**iv. Parks.** The proposed near-term projects include the construction of a hotel and exhibit hall structure, Health Club/Sports Training Facility, paving of the East Parking Lot, realignment of the Solana Gate entrance, etc., and would improve site conditions at the Del Mar Fairgrounds to further support the goal of the 22nd DAA to manage and promote a world-class, multiuse, public assembly facility. The proposed project would not induce population growth that would generate an increased demand for recreational facilities (see Section 4.13 for additional discussion on existing recreational facilities and impacts). Therefore, it is not anticipated that recreation facilities or the availability of recreation resources in the project vicinity area would be affected by project implementation, and no mitigation is required. Although the proposed project would not result in significant impacts to existing parks, payment of recreation fees may be required for the proposed condominiums as a result of application of the City's Subdivision regulations.

**v. Transit.** The proposed near-term projects include the construction of a hotel and exhibit hall structure, Health Club/Sports Training Facility, paving of the East Parking Lot, realignment of the Solana Gate entrance, etc., and would improve site conditions at the Del Mar Fairgrounds to further support the goal of the 22nd DAA to manage and promote a world-class, multiuse, public assembly facility. The NCTD's geographical service area encompasses the project site, and while the proposed near-term projects may increase the attendance of on-site visitors and personnel during the Interim Season, they would not significantly increase the daily maximum number of on-site visitors and personnel; therefore, the near-term projects would not cause adverse effects on NCTD's or Amtrak's ability to provide service to the region, and no mitigation is required. The increased use of the project site during the Interim Season may increase demand for regular service to the Fairgrounds site and could potentially increase the viability of transit service to the site.

**Long-Term Project Impact Analysis.** Long-term projects include construction of a multilevel parking structure, a new Horseman's Village, vehicle wash rack, a truck tunnel, a seasonal train platform, and improvements to the Backstretch Area. The long-term projects are improvements or replacements of existing facilities and are not intended to increase attendance or employment at the Fairgrounds. Therefore, the long-term projects are not expected to increase either the average or maximum number of on-site visitors and personnel. Implementation of the multilevel parking structure, Horseman's Village, truck tunnel, and improvements to the Backstretch Area would not cause significant impacts to fire protection services, police protection services, schools, or parks; therefore, no mitigation is required. Implementation of the seasonal train platform project would allow direct access to the project site and may increase train ridership. The seasonal train platform is intended to provide convenient rail service directly to the Fairgrounds site during the Fair and Race Meet. The increased use of train service during the Fair and Race Meet is expected to reduce the number of cars driven to these events by providing an efficient, cost-effective, and highly convenient alternative to driving and parking for major events. An estimation of the number of vehicle trips that can be saved with the provision of the seasonal train platform will be made when more specifics of the proposal are known and the seasonal train platform undergoes project-level review. However, this

increase in ridership is not expected to be at a level that would require new or physically altered governmental facilities, and is therefore less than significant. No programmatic impact avoidance and mitigation strategies are required.

**Threshold 4.12.2 Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.**

**Near-Term Project Impact Analysis.** As previously discussed in Section 4.11 Hydrology and Water Quality, due to the equestrian uses on site, the San Diego Regional Water Quality Control Board (SDRWQCB) has noted that the Fairgrounds is likely subject to the EPA's Concentrated Animal Feeding Operation (CAFO) permitting requirements for regulating the discharge of animal wastes into State waters. The 22nd DAA has implemented measures (see Section 4.11, Hydrology and Water Quality) to eliminate the discharge of process wastewater from the CAFO production areas at Del Mar Fairgrounds through the combination of the following practices:

- Routing all horse wash waters to the sanitary sewer
- Placing roofs or covering all horse stalls, barns, and stables to route precipitation around the CAFO production areas
- Storage of all contaminated bedding materials (manure-soiled bedding), feed, and manure indoors or in covered storage facilities such that storm water does not contact these materials
- Removing temporary manure stockpiles daily such that they do not come into contact with storm water runoff
- Limiting horse presence to the maximum extent practicable to the covered CAFO production areas (stables/barns) during rain events and when necessary
- Implementing good housekeeping practices such that any manure inadvertently deposited outdoors in the CAFO production area and nonproduction area is removed before pollutants from these materials can be entrained in storm water runoff

In February 2008, the 22nd DAA filed a Report of Waste Discharge (ROWD), Nutrient Management Plan (NMP), and National Pollution Discharge Elimination System (NPDES) application to the SDRWQCB to obtain water discharge requirements specific to CAFO discharges. The application and NMP are currently under review by the SDRWQCB. Once approved by the SDRWQCB, the best management practices (BMPs) and operations outlined in the NMP will be incorporated into the current Industrial Storm Water Pollution Prevention Plan (SWPPP) and Phase II SWMP, once developed; therefore, the proposed near-term projects meet the wastewater treatment requirements of the SDRWQCB. No impacts would occur, and no mitigation is required.

**Long-Term Project Impact Analysis.** Long-term projects include construction of a multilevel parking structure, a new Horseman's Village, a truck tunnel, vehicle wash rack, a seasonal train platform, and improvements to the Backstretch Area. As stated above, and in Section 4.11, Hydrology and Water Quality, of this EIR the 22nd DAA will meet the requirements of the SDRWQCB in effect at the time projects are implemented. Therefore, no impacts would occur regarding wastewater

treatment requirements, and no programmatic impact avoidance and mitigation strategies are required.

**Threshold 4.12.3**      **Require or result in the construction of new water or wastewater treatment or collection facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.**

**Threshold 4.12.5**      **Exceed the water supply of existing entitlements and resources, or require new or expanded entitlements.**

**Threshold 4.12.6**      **Result in a determination by the wastewater treatment provider which serves or may serve the project that does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.**

**Near-Term Project Impact Analysis.** As mentioned previously, the proposed project site is serviced by the City of San Diego for water and wastewater needs for the area east of Jimmy Durante Boulevard and the City of Del Mar for water and wastewater needs for the area west of Jimmy Durante Boulevard. The proposed near-term projects include demolition of existing water and sewer lines within the footprint of the proposed hotel and exhibit hall structures; however, these lines will be replaced, and no other improvements to City of San Diego or City of Del Mar connections are proposed for the project. A discussion of the proposed impacts on the existing facilities, supply, and capacity of water and wastewater facilities servicing the project site is discussed below.

**Water.** As mentioned in Section 4.12.1, the project site west of Jimmy Durante Boulevard is served with potable water by the City of Del Mar via an 8-inch line near the first driveway on Jimmy Durante Boulevard south of Via de la Valle; a 10-inch line just north of the main gate on Jimmy Durante Boulevard; and a 10-inch line across Jimmy Durante Boulevard from the existing fire station.

The City of San Diego supplies water directly to the project site east of Jimmy Durante Boulevard via a 12-inch-diameter water main along Jimmy Durante Boulevard from Via De La Valle south to the existing RV parking lot. A looped 10-inch-diameter water main system also exists surrounding the Hilton Hotel and commercial lots fronting Via De La Valle. A dead-end 8-inch-diameter water main serves the current recreation facilities south of the RV parking lot. While water lines on site would be demolished and replaced during construction of the near-term projects, no improvements, realignments, or relocations of the City of San Diego or City of Del Mar water connections are anticipated.

Implementation of the proposed near-term projects would require compliance with State laws regarding water conservation measures, including pertinent provisions of Title 20 and Title 24 of the California Government Code regarding the use of water-efficient appliances. In addition, the proposed projects will be constructed to meet LEED-NC Silver certification, including measures to reduce water consumption (see Section 4.16, Greenhouse Gases and Energy, in this EIR for more information). Nevertheless, the proposed near-term projects would result in an increase in

water demand for the Cities of San Diego and Del Mar compared to existing conditions. Recent water supply legislation ensures that water supply issues are thoroughly considered as part of the environmental review process. Under Water Supply/CEQA legislation enacted in 2001 (SB 610), if a Lead Agency determines that any project (as broadly defined under the Water Code) is subject to CEQA, it must comply with the water supply assessment procedure as detailed in the State Water Code; however, SB 610 only applies to cities and counties. Therefore, because the 22nd DAA is a State agency (not a city or county), a Water Supply Assessment is not required under SB 610.

The City of San Diego updated its General Plan in 2008. The Final Program EIR prepared for the Draft General Plan considered how population growth anticipated by the General Plan would affect the availability of water supply (Section 3.14 of the Final Program EIR). The analysis considered the Water Authority's 2005 Water Plan, including strategies to increase water supply, conservation efforts by the City, the policies in the Authority's Drought Management Plan that minimize impacts resulting from a water storage, and the ability of the City to condition supply. The EIR concluded that the projected water supply is anticipated to meet water demands for 2030.

Table 4.12.D illustrates the projected additional water demand required for implementation of the proposed near-term projects. Mitigation has been identified in Section 4.16, Greenhouse Gas and Energy, to reduce water demand through compliance with the EPA WaterSense Program to implement water-efficient products (bathroom sink faucets, low-flush urinals, etc; see Mitigation Measure 4.16.7). In addition, implementation of the Sustainability Commitments in the Master Plan (Section 3.5.3 of this EIR) would further reduce water demand (e.g., use of reclaimed water for grounds irrigation and implementation of a comprehensive water conservation strategy for potable water). As stated above, the Water Authority, from which both the City of San Diego and the City of Del Mar purchase water, believes that adequate documentation is available to demonstrate the availability of water to meet projected demand through 2030.<sup>1</sup> While the increased demand from implementation of the Master Plan projects would not be reflected in the 2030 projections, (297,000 AFY with conservation [i.e., low flow toilets] or 350,000 AFY without conservation),<sup>2</sup> the incremental increase in demand as a result of the Master Plan projects is very small in the context of the projected demand for the region in 2030. As shown in Table 4.12.D, the estimated average annual water demand is approximately 25 million gallons per year (approximately 76 AFY). Therefore, with implementation of PDF GHG-1 requiring LEED-NC Silver certification for the Master Plan projects, implementation of Mitigation Measure 4.16.7 and compliance with Title 20 and Title 24 of the California Government Code regarding the use of water-efficient appliances, the project impacts on water supplies and water entitlements would be less than significant. The 22nd DAA will coordinate with the Cities of Del Mar and San Diego to amend applicable water contracts as necessary.

<sup>1</sup> Note the City of San Diego's generation factors were used for the entire project site because the City of Del Mar does not have standard generation factors for new development.

<sup>2</sup> City of San Diego Long-Range Water Resources Plan (2002–2030).

**Table 4.12.D: Proposed Project Estimated Average Annual Water Demands**

Near-Term Project	Land Use	Net Increase in Area (ac)	Generation Factor (gallons/net acre-day)	Water Demand (million gallons per year)
Health Club/Sports Training Facility	Commercial/Institutional	1.38	5,000	2,518,500
Exhibit Halls	Commercial/Institutional	4.59	5,000	8,376,750
Hotel	Hotel	5.88	6,555	14,068,341
<b>Total</b>		11.85	N/A	24,963,591

Source: City of San Diego Facilities Design Standards (2004).

ac = acre(s)

N/A = not applicable

**Wastewater.** Based on the results of the Preliminary Sewer Study (Fusco Engineering, 2009) prepared for the proposed project, included in Appendix I, the proposed project is estimated to generate a net increase in sewer demand of 0.045 mgd or 31 gpm. Near-term projects that will result in increased sewer loads include the proposed hotel, the proposed Health Club/Sports Training Facility, and the increased floor area included in the replacement structures such as the exhibit halls, administration building, and maintenance buildings.

In a response letter for the Notice of Preparation for the proposed project (dated April 29, 2008), the City of San Diego stated that it would be able to adequately serve the wastewater needs for the proposed projects. The current wet weather flow of the sewer pipes located near Jimmy Durante Boulevard, Via de la Valle, and Valley Avenue are at 40 percent, and the City of San Diego projects that construction of the proposed projects would only increase this wet weather flow capacity to 46 percent. The proposed additional flow will require approval by the City of Solana Beach. For the connections of the City of Del Mar and City of San Diego system, the City of San Diego indicated that a Business Case Evaluation is being prepared for Pump Station 65 to assess capacity. The City of San Diego reported it will incorporate the proposed near-term projects to determine the near-capacity conditions for Pump Station 65, and no expansion to this facility is required from implementation of the proposed projects; therefore, no mitigation is required.

As mentioned above, the proposed project site is located in two sewer tributary areas. The first tributary is located on the east side of Jimmy Durante Boulevard, and the City of San Diego owns and operates sewer pipes located near Jimmy Durante Boulevard, Via De La Valle, and Valley Avenue, where sewage flow is transported via City of San Diego sewer pipes to the City of Solana Beach. The second tributary is located on the west side of Jimmy Durante Boulevard; sewage flow is transported from the project site to the City of Del Mar sewer system, which eventually connects to the City of San Diego system, where it is treated and released into the Pacific Ocean. For the tributary located west of Jimmy Durante Boulevard to the City of Del Mar, the 22nd DAA and the City of Del Mar have reached an agreement, as documented in an MOU, for the proposed sewage flow to be conveyed from the 22nd DAA to the City of Del Mar system after implementation of the proposed projects. Recently, efforts were completed (spring 2009) to replace the existing forcemain that runs under the San Dieguito River connecting the

22nd DAA's system to the City of Del Mar's system. This replacement was an independent project addressed in a separate CEQA document, and no actions are required as part of this Master Plan for the replacement. According to the MOU between the City of Del Mar and the 22nd DAA, project-generated wastewater will not exceed the agreed-upon capacity of the sewer delivery system and therefore will not require the construction of new off-site sewer infrastructure. The 22nd DAA will implement on-site improvements to ensure that sewer flows are required to comply with the MOU. These improvements could include a holding tank constructed in conjunction with the hotel project. The proposed project will not result in disruption of service or adversely impact the City of Del Mar's capacity to serve the surrounding area. Impacts to wastewater services would be less than significant, and no mitigation is required.

**Long-Term Project Impact Analysis.** Long-term projects include construction of a multilevel parking structure, a new Horseman's Village, a truck tunnel, vehicle wash rack, a seasonal train platform, and improvements to the Backstretch Area. The proposed long-term projects are not expected to result in a significant impact related to increased demand for water or wastewater. Impacts to water and wastewater services as a result of long-term projects would be less than significant, and no programmatic impact avoidance and mitigation strategies are required.

**Threshold 4.12.4      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.**

**Near-Term Project Impact Analysis.** The proposed near-term projects, which include the construction of a hotel and exhibit hall structure, Health Club/Sports Training Facility, paving of the East Parking Lot, realignment of the Solana Gate entrance, etc., would improve site conditions at the Del Mar Fairgrounds to further support the goal of the 22nd DAA to manage and promote a world-class, multiuse, public assembly facility.

As discussed in detail in Section 4.11, Hydrology and Water Quality, of this EIR, construction of new on-site storm drain systems would be required as part of implementing the near-term projects in the 2008 Master Plan. These alterations would be designed to provide necessary capacity for storm water runoff. However, the larger drainage areas would remain the same for the entire project site, and runoff would continue to drain generally from northeast to southwest, discharging at the existing discharge points. Given that the projects would generally be replacing one impervious surface for another, in most case only minor increases to on- and off-site flows would occur. (The primary exception would be the East Parking Lot, which is planned to be paved with bioswales and bioretention incorporated to treat storm water.) Construction of each of the projects will comply with the requirements of the SDRWQCB in effect at the time of project implementation. Construction of storm drain facilities beyond those included in the project (and outlined above) would not be required. Therefore, impacts of the planned storm water drainage systems to the environment are considered less than significant, and no mitigation is required.

**Long-Term Project Impact Analysis.** Impacts of the long-term projects to planned storm water drainage systems are essentially the same as those discussed above under near-term projects. For the reasons discussed above under near-term projects, and as further evaluated in Section 4.11, Hydrology and Water Quality, of this EIR, the long-term project impacts to planned storm water drainage systems are considered less than significant, and no mitigation is required.

**Threshold 4.12.7 Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs.**

**Threshold 4.12.8 Comply with federal, state, and local statutes and regulations related to solid wastes including the California Integrated Waste Management Act of 1989, AB 75, and AB 939.**

**Near-Term Project Impact Analysis.** The proposed near-term projects would result in solid waste generation during construction of the near-term projects and operation of projects that do not currently generate solid waste (i.e., hotel and Health Club/Sports Training Facility). The CIWMB estimates that commercial uses in San Diego County generate an average of 8 pounds/employee/day.<sup>1</sup> The 22nd DAA estimates that near-term projects would increase the number of employees by 433 full-time equivalent (FTE) employees; therefore, prior to implementation of existing recycling programs, operation of the near-term projects would be anticipated to generate approximately 632 tpy of solid waste. The Fairgrounds collects and hauls solid waste from the project except during the Thoroughbred Race Meet, when a contract hauler is used. The Fairgrounds brings solid waste to the Miramar Landfill, which is operated by the City of San Diego. The Miramar Recycling Center is located at the landfill.

As discussed above, the Del Mar Fairgrounds has established a "zero waste" goal. The Del Mar Fairgrounds achieved a 91.3 percent (over 41 million pounds) diversion rate for its solid waste in 2005. The "zero waste" policy would apply to all proposed buildings and uses on the Fairgrounds site, including the proposed hotel. If a 91.3 percent diversion rate is applied to the project solid waste generation, the proposed near-term projects would result in an anticipated disposal rate of 55 tpy. Continuation of the 22nd DAA's "zero waste" policy would apply to operation of the proposed near-term projects as included in the Sustainability Component discussed in Section 3.5.3 of this EIR. The County of San Diego accounted for a gradual increase in waste generation and disposal needs on a Countywide basis. If no additional in-County physical capacity is added, it is estimated the County would potentially run out of physical waste disposal capacity in approximately 2016.<sup>2</sup> Near-term Master Plan projects are anticipated to be completed by 2014. The waste disposal requirements of the near-term project would be less than 0.01 percent of the total waste disposal capacity in the County in 2017. Although the proposed project would generate waste that would require disposal capacity, it would be at levels within the existing service capacity of regional disposal sites. Therefore, operation of the near-term projects would have a less than significant impact on solid waste disposal needs.

<sup>1</sup> CIWMB (2008). Countywide Profile for San Diego County. Web site: <http://www.ciwmb.ca.gov/Profiles/County/CoProfile1.asp?COID=37>, accessed June 10, 2008.

<sup>2</sup> County of San Diego Department of Public Works. San Diego Integrate Waste Management Plan Countywide Siting Element. 2005 5-year Revision Final. 2005.

Construction of the near-term projects would generate additional solid waste, and mitigation identified in Section 4.16, Greenhouse Gases and Energy, of this EIR is required to reduce construction-related waste. Mitigation Measure 4.16.13 requires the 22nd DAA to prepare a Building Materials Recycling Plan to identify how demolished building materials can be reused on site. Implementation of Mitigation Measure 4.16.13 would reduce impacts from construction-related waste to less than significant, and no additional mitigation is required.

Solid waste practices in California are governed by multiple federal, State, and local agencies that enforce legislation and regulations that ensure that landfill operations minimize impacts to public health and safety and the environment. The California Integrated Waste Management Act of 1989, enacted through AB 939 and modified by subsequent legislation, required all California cities and counties to implement programs to reduce, recycle, and compost at least 50 percent of waste by 2000 (PRC Section 41780). For the biennial review for 2005/2006, the last year for which information is available, the Cities of Del Mar and San Diego were in full compliance with waste diversion goals set by the State of California. In addition, the Fairgrounds achieved a 91.3 percent waste diversion rate in 2005, and continuation of the “zero waste” policy is identified in the Sustainability Component of the 2008 Master Plan, described in Section 3.5.3. of this EIR. Mitigation Measure 4.16.13 requires the 22nd DAA to prepare a Building Materials Recycling Plan to identify how demolished building materials can be reused on site. Therefore, the proposed project would not hinder the Fairgrounds or the City’s ability to meet its waste diversion goals, and no additional mitigation is necessary.

**Long-Term Project Impact Analysis.** Long-term projects include construction of a multilevel parking structure, a new Horseman’s Village, a truck tunnel, a seasonal train platform, and improvements to the Backstretch Area. These proposed uses are not anticipated to generate high levels of solid waste. The proposed long-term projects would be operated by the same employees as the near-term projects. No growth in the number of employees is expected as a result of the proposed long-term projects. Therefore, with implementation of Mitigation Measures 4.12.3 and 4.16.13, which require recycling and waste diversion, construction and operation of the proposed long-term projects would not cause a significant project impact on San Diego County landfills, and no additional mitigation is required.

#### **4.12.7 Cumulative Impacts**

**Fire Protection.** The geographic area for cumulative analysis of fire protection services is defined as the service territory for the DMFD; however, it is noted that the San Diego Fire Department, Encinitas Fire Department, Solana Beach Fire Department, and Rancho Santa Fe Fire Protection District entered into a mutual aid agreement for fire protection services. As discussed in Section 4.10, the City of Del Mar can expect another 2 percent total population growth until 2010 (for a total of 6 percent from 2000 to 2010), a 10 percent growth from 2010 through 2020, and a 7 percent growth from 2020 through 2030. These growth projections are generated by SANDAG using the latest census data, local input, and historical growth trends and reflect reasonable foreseeable development and growth.

As stated earlier in this section, the DMFD confirmed that the project requires relocation of the existing fire station off site. The DMFD anticipates cumulative demand in order to plan for overall service. Therefore, the DMFD determination that additional equipment is required to provide adequate service includes consideration of area demand in light of cumulative planned or anticipated projects; therefore, implementation of Mitigation Measures 4.1.3 and 4.1.4 would reduce projects impacts to less than significant. No cumulative impacts would occur, and no additional mitigation is required.

**Law Enforcement.** The geographic area for cumulative analysis of police protection services is defined as the City of Del Mar service territory for the San Diego County Sheriff's Department. As stated above, the City of Del Mar can expect another 2 percent total population growth until 2010 (for a total of 6 percent from 2000 to 2010), a 10 percent growth from 2010 through 2020, and a 7 percent growth from 2020 through 2030. The County of San Diego is projected to experience a 15 percent increase in population from 2000 to 2010, a 12 percent increase from 2010 to 2020, and a 10 percent increase from 2020 to 2030. These growth projections are generated by SANDAG using the latest census data, local input, and historical growth trends and reflect reasonable foreseeable development and growth.

Any future projects will likely include specific features designed to reduce impacts on police protection services and may require additional mitigation measures specific to the given project's impacts. The need for additional police protection services associated with cumulative growth will be addressed through the annual budgeting process, when budget adjustments may be made to meet changes in service demand. Therefore, the project's incremental contribution to cumulative impacts to law enforcement is considered less than significant.

**Transit Services.** The geographic area for cumulative analysis of transit services is defined as the service territory for the NCTD, which includes the project site. The proposed project is not expected to have a significant impact on the provision of transit services in San Diego County or the area surrounding the project site. The Master Plan projects are not expected to result in a notable increase in use of existing transit service, as most Fairgrounds patrons access the site via personal or chartered vehicles. The Master Plan does include provision of a seasonal train platform on site. The seasonal train platform would support increased and direct rail service to the Fairgrounds during the Fair and Race Meet Season. This additional train service would be a new transit service to the site, and is not expected to adversely affect the provision of other transit service to and in the vicinity of the Fairgrounds. The seasonal train platform will be subject to subsequent CEQA review with a transit agency, such as SANDAG, serving as the CEQA Lead Agency. Any increase that does result from implementation of the proposed project would be incidental and not cumulatively considerable because transit services would not be adversely impacted by the proposed project. Therefore, the project's incremental contribution to cumulative transit impacts is considered less than significant.

**Water.** The geographic area for the cumulative analysis for water supply is defined as the Water Authority service area, since the City of Del Mar purchases water from the Water Authority. Although the proposed project and future planned projects may increase demand for potable water, there is sufficient water supplies to compensate for increased demand through 2030. The City of San

Diego Long-Range Water Resources Plan (2002–2030) identifies the demand in 2030 to be approximately 297,000 AFY with conservation and 350,000 AFY without conservation. The estimated average annual water demand for the near-term projects is approximately 25 million gallons (76 AFY). Therefore, the proposed project's incremental contribution to regional water supply demand is not considerable. With implementation of the Sustainability Commitments of the Master Plan (Section 3.5.3 of this EIR) and Mitigation Measure 4.16.9 requiring implementation of the EPA's WaterSense Program, the project's contribution to water demand is further reduced, and the project's contribution to cumulative water supply impacts would be less than significant. No significant cumulative impacts on potable water services are expected to occur as a result of project implementation.

**Wastewater.** The geographic area for the cumulative analysis for wastewater treatment is defined as the two sewer tributary areas operated by MWWD. The first tributary area, located on the east side of Jimmy Durante Boulevard, experiences current peak wet weather flows that are at approximately 40 percent of the capacity.<sup>1</sup> The project's incremental contribution to cumulative effects to this tributary are not considerable, given the largely built out nature of the tributary area. The second tributary area is located on the west side of Jimmy Durante Boulevard. As mentioned above, the City of Del Mar and the 22nd DAA have an MOU that officially sets peak flow per minute, peak daily flow, and average daily flow. The MOU (December 2008) stipulates that the 22nd DAA's peak flow not exceed any of the following levels:

- Flow of 630 gallons per minute (gpm) as averaged over a 15-minute time frame
- Peak daily flow of 792,000 gallons per day (gpd)
- Average daily flow of 156,000 gpd

With these limitations in place, the incremental contribution of the Master Plan projects to the sewer capacity of the second tributary is not considered to be considerable, as the proposed project flows are consistent with the City of Del Mar's contractual limit for the average annual daily flow (ADF) to the MWWD system. The tributary area for the second tributary is also largely built out. Therefore, with the sewer MOU in place, the cumulative impact to sewer demand is less than significant.

**Landfill.** The geographic area for the cumulative analysis for landfills is defined as the County of San Diego. As discussed above, the proposed project would have a less than significant impact on landfills. Implementation of the Sustainability Component of the Master Plan (Section 3.5.3 of this EIR) would reduce operational-related impacts, and Mitigation Measure 4.16.13 would further reduce construction-related effects. The Sustainability Component of the Master Plan includes commitments to the 22nd DAA's "zero waste" waste reduction program and landscaping that minimizes the production of plant material waste. The Del Mar Fairgrounds achieved a 91.3 percent (over 41 million pounds) diversion rate for its solid waste in 2005 and has set an ultimate goal of "zero waste." The Del Mar Fairgrounds started its recycling program in 1985 by recycling paper waste. Since that time staff has expanded the program to include recovery of more than 19 different materials, including food discards, beverage containers, and cardboard. The Fairgrounds sorts and separates all recyclables

<sup>1</sup> Letter from Guann Hwang, Senior Civil Engineer at City of San Diego, to Dustin Fuller at 22nd DAA/Del Mar Fairgrounds (dated April 25, 2009).

at on-site facilities. The Del Mar Fairgrounds Resource Conservation Policy prohibits the use of polystyrene containers by food providers on site.<sup>1</sup> Mitigation Measure 4.16.13 requires preparation of a Building Materials Recycling Plan to evaluate the feasibility of reusing demolished materials on site. However, if no additional in-County physical capacity is added, the County may exhaust physical waste disposal capacity in approximately 2016.<sup>2</sup> At this time expansion plans at the Sycamore Sanitary Landfill and construction of the Gregory Canyon Landfill are uncertain. Until such time that additional long-term capacity becomes available, the County is facing a possible waste disposal capacity shortfall. The County could possibly account for physical capacity shortfalls within the County by exporting waste; however, the continued availability of out-of-county disposal sites is not known, and other disposal sites may or may not become available in the future.<sup>3</sup> After implementation of the Sustainability Commitments of the Master Plan, the proposed project is anticipated to generate approximately 55 tpy of waste, which is less than 0.01 percent of the total estimated waste disposal demand in the County in 2017. Although this would not be a significant project impact, the proposed project's incremental contribution to cumulative waste disposal capacity shortfalls could be significant and adverse if the County does not secure additional long-term landfill capacity. Regional landfill capacity decisions and permitting are outside the control of the 22nd DAA. The 22nd DAA furthered the objective of providing adequate regional landfill capacity by aggressively reducing its waste stream. However, for the purpose of this EIR, the proposed project's incremental contribution to cumulative waste disposal shortfalls is considered to be significant and unavoidable until such time as additional landfill capacity has been secured.

#### 4.12.8 Level Of Significance Prior To Mitigation

**Fire Department.** Prior to mitigation, the proposed project would result in a potentially significant impact related to the fire protection services.

**Police Protection.** No significant impacts related to police protection have been identified.

**Public Schools.** No significant impacts related to school capacity have been identified.

**Transit.** No significant impacts related to public transportation have been identified.

**Water/Wastewater.** No significant impacts related to water and wastewater services have been identified.

**Storm water.** No significant impacts related to storm water services have been identified.

<sup>1</sup> CIWMB. Del Mar Fairgrounds, California. Case Studies. Accessed February 9, 2009

<sup>2</sup> County of San Diego Department of Public Works. San Diego Integrated Waste Management Plan Countywide Siting Element. 2005 5-year Revision Final. 2005.

<sup>3</sup> County of San Diego Department of Public Works. San Diego Integrated Waste Management Plan Countywide Siting Element. 2005 5-year Revision Final. 2005.

**Solid Waste.** Prior to mitigation, the proposed project would result in a potentially significant cumulative impact related to solid waste capacity in the County.

#### **4.12.9 Mitigation Measures**

Mitigation measures to reduce potentially significant impacts to the provision of fire protection services as a result of the planned demolition of the existing fire station are listed in Section 4.1, Land Use, and are copied below for ease of reference.

**Mitigation Measure 4.1.3** Prior to demolition of the existing on-site fire station, the 22nd District Agricultural Association (DAA) will make arrangements for the acquisition of the destination site (Parcels 30/31) for the new fire station. A certificate of occupancy for the new fire station shall be required prior to initiation of demolition of the existing fire station (also, see Mitigation Measure 4.1.1).

**Mitigation Measure 4.1.4** Prior to demolition of the existing fire station, the lead agency for implementing the fire station will apply for approval of the necessary City of Del Mar discretionary permits, including (1) a local Conditional Use Permit (CUP), (2) a Standards Variance for height; (3) Design Review Board approval, and (4) a Local Coastal Development Permit (LCDP) from the City of Del Mar to construct the new fire station. A Certificate of Occupancy for the new fire station is required prior to initiation of demolition of the existing fire station. The 22nd District Agricultural Association (DAA) will verify approval of the local discretionary actions.

#### **4.12.10 Programmatic Impact Avoidance and Mitigation Strategies**

As mentioned above, the proposed long-term projects would not result in significant impacts related to public service and utilities; therefore, programmatic impact avoidance and mitigation strategies for long-term projects are not required.

#### **4.12.11 Level of Significance after Mitigation**

As discussed above, the project may have a potentially significant impact on fire protection services, and cumulative solid waste services. Implementation of Mitigation Measures 4.1.3 and 4.1.4 will reduce potential project impacts to a less than significant level. Specifically, Mitigation Measures 4.1.3 and 4.1.4 will reduce the potential impacts to fire services associated with demolition of the existing fire station facility to less than significant. Implementation of the Sustainability Component of the Master Plan and mitigation measures identified in Section 4.16 further reduce cumulative solid waste impacts; however, even with implementation of mitigation measures, the project's incremental contribution to cumulative impacts related to solid waste disposal capacity in the County of San Diego would remain significant and adverse.