

5.0 ALTERNATIVES

5.1 INTRODUCTION

The California Environmental Quality Act (CEQA) requires that an Environmental Impact Report (EIR) consider a reasonable range of feasible alternatives to the project, or to the location of the project, that could attain the basic objectives of the project but avoid or substantially lessen any of the significant effects of the proposed project. The EIR must briefly describe the rationale for selecting the range of alternatives discussed and identify alternatives that were considered and rejected by the Lead Agency, with an explanation of the determination. The comparative merits of selected alternatives must be evaluated in comparison to the proposed project. This chapter sets forth potential alternatives to the proposed project and evaluates them, as required by CEQA and the CEQA Guidelines.

Key provisions of the CEQA Guidelines on alternatives (Section 15126.6) are summarized below to explain the foundation and legal requirements for the analysis of alternatives in an EIR:

- “The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project.” Section 15126.6(d)
- “The discussion of alternatives shall focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly.” Section 15126.6(b)
- The “no project” alternative shall be evaluated along with its impact. “The “no project” analysis shall discuss the existing conditions at the time of the Notice of Preparation is published, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved. If the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” Section 15126.6(e)(2)
- “The range of alternatives required in an EIR is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project.” Section 15126.6(f)
- “Factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, and other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site.” Section 15126.6(f)(1)
- For alternative locations, “only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.” Section 15126(f)(3)

- “An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative.” Section 15126.6(f)(3)

This chapter identifies and analyzes a range of alternatives to the project that could attain the basic project objectives and that would be reasonable and feasible for the project site. A number of alternatives that would not attain all of the project objectives but that are capable of eliminating or reducing impacts that have been determined to be significant for the proposed project have also been evaluated.

In addition to the alternatives selected for evaluation, several possible alternatives were considered but rejected because they failed to meet the project objectives and/or had questionable feasibility. These considered but rejected alternatives, as described in Section 5.4 of this chapter, include a Reduced Project/No Interim Uses Alternative (Alternative 4) (limiting the Fairgrounds to only two major events per year, with a 9-month “dark” [Interim Season] period) and an Alternate Location Alternative (Alternative 5).

The alternatives selected by the 22nd District Agricultural Association (DAA) for further consideration would be reasonable and feasible for the project site, in consideration of the characteristics of the area, the applicable regulations and policies, and public comments received on the Notice of Preparation (NOP). As such, the following three alternatives are evaluated herein (Section 5.5 of this chapter), including the No Project/No Development Alternative (Alternative 1) as required by CEQA:

- Alternative 1: No Project/No Development
- Alternative 2: No Project/Existing Master Plan
- Alternative 3: Reduced Project/No Hotel

For each alternative, the analysis provides the following:

- Description of the alternative.
- Overview of the potential impacts of the alternative and the significance of those impacts. (Per the CEQA Guidelines, significant effects of an alternative shall be discussed, but in less detail than those of the proposed project.)
- Summary comparison of the alternative relative to the proposed impact, specifically addressing whether the alternative would meet the project objectives, the elimination or reduction of impacts compared to the project, and other comparative merits.

Each alternative is analyzed to determine whether it achieves the objectives of the proposed project. The project objectives listed in Chapter 2.0 are repeated below and numbered for reference in this chapter.

5.2 PROJECT OBJECTIVES

Pursuant to Section 15124 of the CEQA Guidelines, the description of the proposed project contains a statement of the objectives sought for development of the proposed project.

The 22nd DAA Mission Statement is:

To manage and promote a world-class, multi-use, public assembly facility with an emphasis on agriculture, education, entertainment, and recreation in a fiscally sound and environmentally conscientious manner for the benefit of all.

In order to successfully fulfill its mission, the 22nd DAA must upgrade existing, relevant facilities; remove limiting and irrelevant facilities; and construct new facilities that respond to the needs of the residents of San Diego County.

5.2.1 Goals

Several long-range goals were established to guide the Master Plan process and subsequent implementation. Although it is a public entity, the 22nd DAA is entirely self-supporting. Operations, maintenance, reconstruction of aging facilities, and new construction are funded almost exclusively from the proceeds of income-producing events on the property. Major facility construction projects such as the 1993 building of the Grandstands and the new livestock barns were funded by the sale of tax-exempt bonds. Therefore, the goal of the Master Plan is to identify key physical improvements that will promote the mission of the Del Mar Fairgrounds as a regional entertainment, recreational, cultural, and community asset, while continuing the financially responsible practice of maintaining economic self-sustainability. The Master Plan also establishes a long-range vision for the Del Mar Fairgrounds to guide future land use decisions in an environmentally responsible manner.

5.2.2 Objectives

The Master Plan process seeks to integrate and balance a multitude of factors relating to land utilization of the 22nd DAA at the Fairgrounds. Financial, operational, environmental, and community factors all have played substantial roles in the Master Plan process.

The following are near-term objectives of the Master Plan:

1. Develop facilities and operational programs that have a synergistic economic benefit for the Fairgrounds and for adjacent communities.
2. Enhance the visitor experience at the Fairgrounds by providing safe and efficient circulation and parking, modern and functional facilities, clear informational signage, and an attractive built and natural environment.
3. Provide visitor-serving uses on the Fairgrounds site that address the needs of participants and patrons who require overnight stays in order to enable the successful operation of major events.
4. Enhance the Fairgrounds attractiveness to conference planners by providing sufficient on-site hotel accommodations, dining facilities, and modern exhibit hall space to support multiday conference/convention events.
5. Implement improvements that will enhance the economic self-sustainability of the Fairgrounds by attracting a variety of events and users.

6. Implement improvements at the Fairgrounds that represent a balance of permanent facilities and open, flexible-use areas that will support a wide range of activities relating to agriculture, education, entertainment, and recreation consistent with the 22nd DAA Mission Statement.
7. Support the continued success of Horseracing at the Fairgrounds by providing additional amenities for Racehorse owners and racing fans such as short-term residential accommodations on site.
8. Implement appropriate best management practices (BMPs) to meet National Pollutant Discharge Elimination System (NPDES) standards for storm water runoff for existing and planned activities and uses.
9. Provide adequate infrastructure to support existing and planned uses.
10. Support the actions by other public and quasipublic agencies to implement an open space system along the San Dieguito River in a manner that does not impede day-to-day operations at the Fairgrounds.
11. Enhance the participant/patron experience of the Fairgrounds by providing safe, modern, and efficient facilities for Fair vendors as well as equestrians, horse owners, jockeys, horses, and other facility users.
12. Develop uses at the Fairgrounds that recognize the intent of the City of Del Mar General Plan and Torrey Pines Community Plan, and seek to be consistent with the existing General Plan and Community Plan designations for surrounding uses.

The following are long-term Master Plan objectives:

1. Coordinate with other public and quasi-public agencies to improve transit service to the Fairgrounds.
2. Ensure the continued availability of adequate on-site parking at the Fairgrounds.
3. Implement improvements to the Backstretch Area to enhance the living and working environment for equestrians, horse owners, jockeys, horses, and other facility users.
4. Strategically plan and implement strategies to help sustain the financial security of the Del Mar Fairgrounds for present and future generations.

5.3 PROPOSED PROJECT

As previously noted, alternatives must be evaluated as to their ability to reduce or eliminate significant unavoidable adverse environmental impacts associated with the proposed project, including an alternate location, and feasibly attain the basic objectives of the project. The comparative merits of the different alternatives are evaluated in accordance with CEQA.

The proposed project is implementation of the 2008 Master Plan, which includes a wide range of improvements and new facilities consistent with the Master Plan objectives in order to fulfill the Mission Statement of the 22nd DAA. The project site is located in northern San Diego County in the Cities of Del Mar and San Diego and includes an approximately 300-acre (ac) area with Fairgrounds and Racetrack facilities and a 0.78 ac site off-site location proposed for the relocation of the existing fire station. Essentially, two general categories of improvements and facilities emerged through the

22nd DAA's Master Plan process: (1) immediate, near-term projects where the 22nd DAA is the Lead Agency, and (2) conceptual, long-term projects warranting additional definition and refinement at a later date and/or requiring another agency to act as the Lead Agency. Near-term projects are expected to be implemented within 2–4 years of certification of this EIR since a project-level CEQA analysis is being completed at this time. Long-term projects are currently being analyzed at a programmatic-level CEQA analysis, and additional planning and subsequent CEQA review are required to define the precise parameters of the long-term projects. The 22nd DAA is committed to assisting and/or implementing the long-term projects.

Near-Term Projects. The following projects are currently needed for the Fairgrounds to maintain and improve its current level of service to its constituency:

1. **Solana Gate.** Realign Solana Gate Road to provide three lanes and a sidewalk in order to afford better pedestrian access and efficient use of the Backstretch facilities, and construct an equestrian tunnel.
2. **East Parking Lot.** Pave the East Parking Lot to improve an existing dirt parking area with approximately 3,200 all-weather parking spaces and incorporate Water Quality BMPs.
3. **RV Parking Spaces.** Provide sewer hook-up facilities at 62 recreational vehicle (RV) parking spaces in the east Fairgrounds location near Interstate 5 (I-5). Water and electricity hook-ups are currently in place.
4. **Exhibit Halls.** Construct a new exhibit building with breakout rooms (to replace the Pat O'Brien Exhibit Hall, Bing Crosby Exhibit Hall, Exhibit Hall, and tent structure), with parking below the structure and three rooftop sports fields.
5. **Hotel.** Construct a 330-room condominium hotel and accompanying conference facilities in the southern portion of the Fairgrounds. The hotel would be connected to the new exhibit building described above and include an 18,000 sf ballroom and underground parking. The hotel complex area will accommodate parking for 58 RVs (with water, electrical, and sewer hook-ups), the same number of RV parking spaces and hook-ups currently in this area.
6. **Official Gate/Administrative Office.** Construct a new official gate/administration office facility and ticket box office as part of the hotel complex consisting of a three-story, 58,065 sf structure.
7. **Maintenance Buildings/Yard.** Relocate the existing Fairgrounds maintenance buildings/yard to provide storage and workshop areas closer to the areas of the Fairgrounds that they are serving.
8. **Fire Station.** Relocate the existing fire station off site.
9. **Electronic Reader Board Sign.** Construct a two-sided, 192 sf electronic reader board sign along I-5. It will be approximately 48 feet (ft) high.
10. **Health Club and Sports Training Facility.** Construct a 60,000 sf Health Club/Sports Training Facility adjacent to I-5 in the Surf and Turf area of the site.
11. **Turf Track.** Widen the turf track by 25 percent to enhance track operations and maintenance.
12. **Demolition.** Demolish the existing structures to allow for new development, including the groomers' dormitory (known informally as "Motel 6") (48 rooms); the existing maintenance facilities; the Pat O'Brien Exhibit Hall, Bing Crosby Exhibit Hall, Exhibit Hall, and tent

structure; the 22nd DAA marketing/human resources buildings and exhibit offices; the 22nd DAA operations building; the existing fire station; the Don Diego Clock Tower (although elements of the Clock Tower [i.e., decorative tiles] will be retained and used on site); and removal of the production and operations and purchasing trailers.

Long-Term Projects. The following projects are currently in the conceptual phase.

1. **Seasonal Train Platform.** Enhance transit access to the Fairgrounds site by assisting the San Diego Association of Governments (SANDAG) with implementation of a seasonal train platform on site at the Fairgrounds.
2. **Multilevel Parking Structure.** Construct a multilevel parking structure accommodating approximately 1,300 vehicles on a portion of the existing dirt lot (East Parking Lot) between Jimmy Durante Boulevard and I-5.
3. **Backstretch Area.** Improve the existing Backstretch Area by continuing to rebuild stables in accordance with the Backstretch Master Plan.
4. **Horseman's Village.** Build a new Horseman's Village with a 25,000 sf cafe with a viewing platform adjacent to the track; demolish the existing facility.
5. **Truck Tunnel.** Construct a new truck tunnel under the Racetrack.
6. **Vehicle Wash Rack.** Construct a new vehicle wash rack in the area west of the Racetrack.

Please refer to Chapter 3 of this EIR for more information regarding the proposed project. Specifically, Figures 3.4a and 3.4b illustrate the project site, showing the location of the near-term and long-term projects.

The potential impacts of the proposed project are described in Chapter 4, along with feasible mitigation measures to reduce significant impacts. Many of the project impacts are below established thresholds of significance or can be reduced to below thresholds of significance with the implementation of mitigation measures. Some impacts cannot be reduced to below a level of significance, even with mitigation, and are considered unavoidable adverse impacts. The unavoidable adverse impacts for the proposed project include:

1. **Traffic:** The following facilities have significant impacts for which there are no feasible improvements possible:
 - Intersections:
 - 6. Via de la Valle/Interstate 5 (I-5) southbound (SB) Ramps
 - 7. Via de la Valle/I-5 northbound (NB) Ramps
 - Street Segments:
 - **Camino Del Mar:** Jimmy Durante Boulevard to 15th Street
 - **Camino Del Mar:** 15th Street to 11th Street

Mitigation has been identified for the other potentially significant traffic impacts, however, for the purposes of this EIR, project contribution to the impacts will remain significant and adverse until the appropriate agency approves and implements each noted improvement in Mitigation Measure 4.2.3. Should the agencies agree to plan and construct these improvements, many of the impacts would be mitigated as shown in Table 4.2.BS. Without mitigation, all impacts are significant.

The 22nd DAA is committed to working with Caltrans and the Cities of Del Mar, Solana Beach, and San Diego to implement these mitigation measures to the best of its ability and in accordance with fair share agreements as described above. However, even if fair share agreements are in place and the 22nd DAA contributes its proportionate fair share, the 22nd DAA cannot ensure the implementation of the improvements, all of which are within the jurisdiction of other agencies. Therefore, all potentially significant traffic impacts are considered to remain significant after mitigation.

The following facilities have significant impacts for which there are no feasible improvements possible:

- Via de la Valle/I-5 SB ramps
- Via de la Valle/I-5 NM ramps
- Street Segment Camino Del Mar: Jimmy Durante Boulevard to 15th Street

Without mitigation, all impacts shown in Table 4.2.BS will remain significant after mitigation. Since implementation of mitigation cannot be ensured by the 22nd DAA, all potentially significant traffic impacts are presumed to remain significant for the purposes of CEQA conclusions.

2. **Air Quality:** The following impacts are significant and unavoidable: construction emissions of reactive organic gas (ROG), operational emissions of particulate matter less than 10 microns in diameter (PM₁₀), conflict with or obstruct implementation of the San Diego Air Basin 2004 Triennial Regional Air Quality Strategy (RAQS) Revision, and cumulative impact to air quality for ROG and PM₁₀ as a result of contribution to serious non-attainment status for 1-hour ozone (O₃) and PM₁₀.
3. **Noise:** The proposed relocation of the fire station may result in a significant operational noise impact to nearby sensitive receptors for emergency vehicle sirens. This impact can be reduced to below a level of significance with implementation of Mitigation Measure 4.4.5; however, implementation of this measure requires action by a public agency other than the 22nd DAA. Since implementation of the mitigation measure is within the control of another jurisdictional agency (i.e., Del Mar Fire Department), implementation cannot be assured by the 22nd DAA. Should the Del Mar Fire Department choose not to implement these operational procedures, the related project impacts may remain significant and adverse. The 22nd DAA is committed to working with the Del Mar Fire Department to implement the mitigation measure to the best of its ability. However, because the 22nd DAA cannot ensure compliance by other agencies, for the purposes of this EIR, the impact is considered to remain significant after mitigation.

4. **Public Services and Utilities:** If no additional in-County physical landfill capacity is added, the County may exhaust physical waste disposal capacity in approximately 2016. The project's incremental contribution to cumulative waste disposal shortfalls could be significant and adverse.
5. **GHG:** Total GHG emissions of the proposed project would exceed current levels generated at the project site and are considered to be cumulatively considerable.

5.3.1 Objectives

The proposed project implements the project objectives. The proposed project includes new uses at the Fairgrounds (hotel complex, Health Club/Sports Training Facility, electronic reader board sign, seasonal train platform, multilevel parking structure, and truck tunnel under the Racetrack), replacement projects (exhibit halls, administrative offices, official gate, maintenance buildings/yards, fire station, Backstretch Improvements, and Horseman's Village) and improvement projects to existing facilities (East Parking Lot, RV parking spaces, Solana Gate, and turf track widening). The near-term and long-term components of the proposed project implement the project objectives.

The proposed Master Plan projects at the Fairgrounds represent a balance of permanent facilities (hotel, exhibit halls, Health Club/Sports Training Facility) and open, flexible-use areas (East Parking Lot, other parking areas) that will support a wide range of activities relating to agriculture, education, entertainment, and recreation consistent with the 22nd DAA Mission Statement. The Master Plan improvements will allow better year-round use of the Fairgrounds, expanding the number of days per year that events are occurring on site and opportunities for synergistic economic benefits to be realized by both the Fairgrounds and adjacent communities. The visitor experience at the Fairgrounds will be enhanced with the provision of new and more modern exhibit space, more safe and efficient circulation with the Solana Gate improvements, more safe and convenient parking in the East Parking Lot, more modern and functional RV facilities, clear informational signage on I-5, and an attractive built and natural environment that includes the extension of the Mission-style architectural design and the long-term habitat restoration of the South Lot.

The new truck tunnel to improve access to the Racetrack infield, Backstretch improvements to replace aged stable structures, the new Horseman's Village to support horse owners and workers during the Race Meet, and the widening of the turf track to better accommodate turf Race Meets all support the continued success of Horseracing at the Fairgrounds by providing additional amenities for Racehorse owners and Race Meet-related staff. Other components of the Master Plan, including the hotel, are expected to be utilized by both horse owners and racing fans by providing short-term overnight accommodations on site.

The proposed hotel will meet the needs of participants and patrons who require overnight stays in order to enable the successful operation of major events. The hotel and new exhibit space will enhance the Fairgrounds attractiveness to conference planners by providing sufficient on-site hotel accommodations, dining facilities, and modern exhibit hall space to support multiday conference/convention events. These improvements, along with the new Health Club/Sports Training Facility and replacement exhibit halls, are expected to enhance the economic self-sustainability of the Fairgrounds by attracting a variety of events and users.

The Master Plan projects are consistent with the existing General Plan and Community Plan designations for surrounding uses, as described in Section 4.1 of this EIR. Construction plans for the Master Plan projects will comply with and ensure implementation of appropriate BMPs to meet NPDES standards for storm water runoff, resulting in a net improvement to water quality compared to existing conditions, as described in Section 4.11 of this EIR. Implementation of the Master Plan projects require coordination with other agencies, including but not limited to the City of Del Mar, to ensure that the plans are consistent with existing infrastructure. The replacement of the existing fire station off site ensures the provision of uninterrupted fire service under the proposed project. The Mitigation Strategy of completing habitat restoration of the South Lot (see Section 4.6 of this EIR), in addition to designing landscaped buffer areas along the San Dieguito River to accommodate the Coast to Crest Trail, supports the actions by other public and quasipublic agencies to implement an open space system along the San Dieguito River in a manner that does not impede day-to-day operations at the Fairgrounds.

The long-term Master Plan project of constructing a seasonal train platform on site is a key implementation of the project objective of improving transit service to the Fairgrounds. The provision of a multilevel parking structure to allow habitat restoration of the South Lot will ensure the continued availability of adequate on-site parking at the Fairgrounds. As noted above, the implementation of improvements to the Backstretch Area, including replacement stable structures and a new Horseman's Village, will enhance the living and working environment for equestrians, horse owners, jockeys, horses, and other facility users.

The Master Plan improvements to Fairgrounds and Race Meet facilities are intended to enhance the participant/patron experience of the Fairgrounds by providing safe, modern, and efficient facilities for Fair vendors as well as equestrians, horse owners, jockeys, horses, visitors, and other facility users. Overall, the combination of near-term and long-term projects results in the strategic implementation of projects that help sustain the financial security of the Del Mar Fairgrounds for present and future generations.

5.4 ALTERNATIVES CONSIDERED BUT REJECTED

In evaluating an appropriate range of alternatives to the proposed project, a number of alternatives were considered and rejected by the Lead Agency. These included a Reduced Project/No Interim Uses Alternative (Alternative 4) and an Alternate Location Alternative (Alternative 5). Both of these alternatives were rejected for differing reasons, as described briefly below.

5.4.1 Reduced Project/No Interim Uses (Alternative 4)

The Del Mar Fairgrounds hosts two major events per year, the San Diego County Fair and the Thoroughbred Race Meet hosted by the Del Mar Thoroughbred Club. The Fairgrounds is also host to numerous other medium and small events throughout the year, including the Del Mar Holiday of Lights from Thanksgiving through the New Year, the Scream Zone Halloween event held for several weeks in October, home and garden shows, horse shows, car shows, gem and mineral shows, and other similar events. This alternative assumes implementation of the 2008 Master Plan projects, but limits the Fairgrounds operation to only hosting the two major events discussed above in order to determine whether such operation limitations would reduce any of the proposed project impacts found

to be significant and unavoidable. This alternative would assume the Fairgrounds would be operational from early June at the start of the San Diego County Fair through early September, at the close of the Horseracing Season. The site would be “dark” for almost 9 months of the year, after Horseracing Season ends in September until the San Diego County Fair reopens the following June.

The Reduced Project/No Interim Uses Alternative (Alternative 4) assumed implementation of the 2008 Master Plan near-term and long-term projects, with the exception of the Health Club/Sports Training Facility. Projects such as the Solana Gate improvements, hotel and new exhibit halls, and East Parking Lot improvements, among others, would enhance the visitor and user experience of the Fair and Race Meet. The Health Club/Sports Training Facility would be a new year-round use and therefore not an appropriate component of the Reduced Project/No Interim Uses Alternative that would have the site “dark” for 9 months of each year.

The Reduced Project/No Interim Uses Alternative (Alternative 4) would meet or further the intent of several project objectives. For example, this alternative would allow the Fairgrounds to renovate and improve existing facilities and infrastructure, and in doing so would upgrade the affected portions of the site to comply with new environmental regulations. This alternative would also balance permanent facilities and open, flexible-use areas and support the actions by other public and quasipublic agencies to implement an open space system along the San Dieguito River. However, the Reduced Project/No Interim Uses Alternative would only attain these objectives during 3 months of the year since the Reduced Project/No Interim Uses Alternative also assumes the project site to be “dark” for 9 months of the year, therefore limiting use of the project site and the improvements implemented by the Master Plan projects.

The Reduced Project/No Interim Uses Alternative (Alternative 4) would reduce significant traffic, greenhouse gas (GHG) and operational air quality effects by substantially reducing traffic and emissions during the nonsummer months compared to the proposed project. However, the Del Mar Fairgrounds is a self-sufficient facility, and one of the Master Plan objectives is to “enhance the economic self-sustainability of the Fairgrounds.” The Division of F&E provides fiscal and policy oversight of the network of California Fairs and ensures the best use of available funding and other services. Currently, revenue received during the Interim Season represents approximately 32 percent of the 22nd DAA’s income, and both the total amount and percentage contribution of the Interim Season activity to the DAA’s budget is expected to increase with implementation of the proposed Master Plan projects and the increased use of (and revenue from) the site during the Interim Season. Furthermore, this alternative would not meet the project objective of implementing operational programs that have a synergistic economic benefit for the Fairgrounds and adjacent communities. Nearby businesses in the Cities of Del Mar, San Diego, and Solana Beach would be expected to realize a reduction in sales tax revenue if there are no visitors or events at the Fairgrounds for 9 months of the year. Currently, some of the visitors using the Fairgrounds site during the Interim Season may patronize nearby hotels, shops, and restaurants. With implementation of the proposed project, the positive synergistic economic effect on the adjacent communities is expected to increase substantially during the Interim Season, when more guests are at the Fairgrounds and staying in overnight accommodations on site. The Reduced Project/No Interim Uses Alternative would be expected to result in reduced synergistic economic effects compared to both the existing and proposed project conditions. The operational restrictions of the Reduced Project/No Interim Uses Alternative would also constrain the mission of the Del Mar Fairgrounds as a regional entertainment, recreational, cultural, and community asset by restricting use by community groups, youth and adult

sports leagues, equestrians, and business/trade groups. The 22nd DAA found that this alternative would be financially infeasible and inconsistent with its Mission Statement and with the project objectives; therefore, the 22nd DAA rejected the Reduced Project/No Interim Uses Alternative.

5.4.2 Alternate Location (Alternative 5)

Section 15126(f)(2)(A) of the CEQA Guidelines describes the “key questions and first step in analysis” as “whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location.” Further, only locations “that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.” The significant effects of the proposed project include air quality emissions, traffic, GHG, and public service and utility impacts during construction and/or operation.

The Alternate Location Alternative (Alternative 5) considered implementation of the 2008 Master Plan projects at a location in San Diego County other than the existing site. The alternative location would require acquisition of an approximate 300 ac project site with regional access and be configured such that the near-term and long-term projects could be implemented.

The Alternate Location Alternative (Alternative 5) could attain the majority of the 22nd DAA’s 2008 Master Plan objectives at a new location, since the Alternate Location Alternative (Alternative 5) would provide the Fairgrounds the opportunity to construct all new, safe, and efficient circulation, parking, and modern, functional facilities. Hotel accommodations, dining facilities, and modern exhibit hall space could be constructed and new environmental regulations would be met with the Alternate Location Alternative (Alternative 5). However, while many of the objectives could be met under the Alternate Location Alternative (Alternative 5), the Fairgrounds and Racetrack have been located in the Cities of Del Mar and San Diego since 1926, and regional access from I-5 for San Diego County and Orange County would be difficult to replace. A review of 2008 aerial photo data indicated that there are no available vacant sites of sufficient size along the I-5 corridor in San Diego County. Furthermore, relocating the Fairgrounds to a suitable site in San Diego County that could accommodate the same existing and planned uses would be difficult and expensive for the 22nd DAA and is likely to face community opposition if introduced as a new use in a developed area. While it is presumed that revenue from the sale of the existing Fairgrounds site could offset the costs of new land acquisition, there are numerous other financial and legal obstacles to relocating the Fairgrounds, including the proper disposition and reuse of the existing site and the costs of recreating extensive existing infrastructure, including the Racetrack, Grandstands, arena, and multipurpose activity center. While it is speculative to attempt to assess impacts that could result from site re-use, it is possible that such impacts would be greater than with the proposed project. One of the key objectives of the 2008 Master Plan is to enhance economic self-sustainability of the Fairgrounds, and relocating the project to another flat, 300 ac, regionally accessible site would be prohibitively expensive to the 22nd DAA, therefore contradicting a key project objective and precluding it from being a feasible alternative for the project.

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In order to accommodate any alternative development scenario, the following conditions are assumed:

1. All new replacement structures in the public areas of the site would be designed with Mission-style architecture
2. Any development would continue to provide or support recreational use of the site
3. Development would not block coastal access or access to the Coast to Crest Trail
4. The San Dieguito River and Lagoon would not be directly or indirectly adversely impacted by new projects
5. Water Quality BMPs are required of new projects
6. New development would update existing/aging facilities on site
7. Economic self-sustainability must be maintained
8. Any new development would continue to accommodate San Diego County Fair and Race Meet

The following alternatives to the proposed project were developed pursuant to the requirements of Section 15126 of the CEQA Guidelines. The alternatives to the proposed project listed below will be evaluated.

5.5.1 No Project/No Development Alternative (Alternative 1)

No Project/No Development (Alternative 1). Consistent with Section 15126.6 of the CEQA Guidelines, the No Project/No Development Alternative (Alternative 1) is the existing condition of the project site at the time the Notice of Preparation (NOP) was published in March 2008. The setting of the site at the time of the NOP is described throughout Chapter 4.0 of this EIR with respect to individual environmental issues and forms the baseline of the impact assessment of the proposed project. This alternative summarizes environmental conditions that would exist if no development of any kind were to occur on site.

The arena roof project was considered a reasonably foreseeable project under any project alternative because it was identified in the earlier 1985 Fairgrounds Master Plan and the Initial Study/Mitigated Negative Declaration (IS/MND) was approved by the 22nd DAA Board of Directors in January 2008. Construction was completed in spring 2009. Also, the 22nd DAA Board of Directors approved an IS/MND in September 2008 for replacement of a pipeline with a new forcemain pipeline under the San Dieguito River. Other minor repair and improvement projects would be expected to occur even without adoption of the proposed 2008 Master Plan, consistent with past actions on the part the 22nd DAA to maintain and improve the existing facilities. Therefore, minor improvements to existing buildings and facilities, including repair and upgrade of horse stables, grooms' dorms, and existing office space would be expected to occur.

Attainment of Project Objectives. Alternative 1 would not implement any of the 22nd DAA's basic objectives or overall goal of the Master Plan for the proposed project and the project site. Specifically, key physical improvements to promote the Fairgrounds as a "regional entertainment, recreational, cultural, and community asset, while continuing the financially responsible practice of maintaining economic self-sustainability," as stated in the project goal, would not be implemented. The 22nd DAA would not be able to substantially upgrade existing, relevant facilities, remove limiting and irrelevant facilities, or construct new facilities to respond to the needs of the participants,

patrons, and conference planners. On-site accommodations for Fairgrounds users and visitors would not be constructed and Alternative 1 would not enhance the economic self-sustainability of the Fairgrounds or implement appropriate BMPs to meet new environmental standards. A more detailed summary of the attainment of project objectives under Alternative 1 is provided below.

- Alternative 1 does not represent a balance of permanent facilities and open, flexible-use areas that will support a wide range of activities relating to agriculture, education, entertainment, and recreation consistent with the 22nd DAA Mission Statement because the new projects, including the hotel, exhibit halls, Health Club/Sports Training Facility, and East Parking Lot improvements will not be constructed.
- Alternative 1 does not create new opportunities for synergistic economic benefits to be realized by both the Fairgrounds and adjacent communities.
- With implementation of Alternative 1, improvements are limited to minor repair and upgrade of existing facilities. Therefore, the visitor experience at the Fairgrounds will not be enhanced with the provision of new and more modern exhibit space, more safe and efficient circulation with the Solana Gate improvements, more safe and convenient parking in the East Parking Lot, more modern and functional RV facilities, clear informational signage on I-5, and an attractive built and natural environment that includes the extension of the Mission-style architectural design to new projects, and the long-term habitat restoration of the South Lot. The restoration of a portion of the South Lot that is presently underway would still occur with this alternative.
- The Master Plan projects to support the continued success of Horseracing at the Fairgrounds by providing additional amenities for Racehorse owners and Race Meet-related staff would not be implemented. Specifically, the new truck tunnel to improve access to the Racetrack infield, Backstretch improvements to replace aged stable structures, the new Horseman's Village to support horse owners and staff during the Race Meet, and the widening of the turf track to better accommodate turf Race Meets would not be realized.
- The proposed hotel and new exhibit halls would not be constructed with implementation of Alternative 1. Therefore, Alternative 1 would not enhance the Fairgrounds attractiveness to conference planners by providing sufficient on-site hotel accommodations, dining facilities, and modern exhibit hall space to support multiday conference/convention events. Other improvements that would not occur with implementation of Alternative 1 include the new Health Club/Sports Training Facility. This Alternative would not enhance the economic self-sustainability of the Fairgrounds by attracting a variety of events and users.
- With implementation of Alternative 1 there would be little or no trigger of the requirements of the NPDES standards for storm water runoff; therefore, the full benefits of upgraded storm water drainage facilities and BMPs may not be realized.
- None of the long-term project objectives would be realized with implementation of Alternative 1. The long-term Master Plan project of constructing a seasonal train platform on site would not occur and the objective of improved transit service to the Fairgrounds would not be realized. Without the provision of a multilevel parking structure, full habitat restoration of the South Lot is not likely to occur, as there would still be a need for the overflow parking capacity provided in the South Lot. Backstretch improvements and a new Horseman's Village would not be implemented to enhance the living and working environment for equestrians, horse owners, jockeys, horses, and other facility users.

Alternative 1 would not further the intent of the project objectives to enhance the participant/patron experience of the Fairgrounds and to sustain the financial security of the Del Mar Fairgrounds for present and future generations.

Environmental Analysis. In leaving the site in its current condition, existing buildings would continue to degrade, limiting their use, and infrastructure would fall into disrepair, requiring increasingly expensive maintenance. BMPs would not be implemented as appropriate to meet NPDES standards for storm water runoff for existing activities and uses. Green building policies such as Leadership in Energy and Environmental Design (LEED-NC Silver) would not be implemented to reduce energy consumption because new projects would not be developed. No additional traffic would be generated to and from the site; air emissions and noise generated by the proposed project site uses would remain the same; the current views of and from the project site would remain the same; and there would be no impact to biological resources. Potential archaeological and paleontological resources would remain disturbed, and this alternative would not generate the need for additional public services and utility consumption. Project and mitigation improvements with the potential to benefit the environment would also not be realized, including the seasonal train platform and habitat restoration of the South Lot.

Conclusion. Alternative 1 would not result in any new physical environmental effects and would avoid significant project-related impacts to regional air quality, traffic, and greenhouse gases in the area on a cumulative basis. Alternative 1 would not further, and therefore would be inconsistent with, the project objectives.

5.5.2 No Project/Existing Master Plan (Alternative 2)

No Project/Existing Master Plan (Alternative 2). Section 15126.6 of the CEQA Guidelines states that the No Project Alternative analysis must evaluate environmental impacts that could reasonably be expected to occur should the project not be approved and if the property were to be developed under existing land use regulations. This alternative assumes that development consistent with the current land use designation will eventually occur on site. The 22nd DAA currently has an approved 1985 Master Plan guiding land use and development on site. The 1985 Master Plan was approved by the State Race Track Leasing Commission and the 22nd DAA in August and September 1985, respectively, pursuant to Section 4516 of the Food and Agricultural Code. Also, the 1985 Master Plan was an update to the 1980 Master Plan, which was also approved by the State Race Track Leasing Commission.

The 1985 Master Plan proposed 14 Capital Improvement Projects as well as 8 Auxiliary Improvements to support development of the project site. The 1985 Master Plan also provided design criteria and a landscaping theme for the Fairgrounds. Alternative 2 assumes the project site would still undergo minor repair and improvement projects without adoption of the 2008 Master Plan; however, these projects would be required to be consistent with the approved 1985 Master Plan for the project site. The following is a list of projects consistent with the 1985 Master Plan; therefore, these projects would be reasonably foreseeable for the project site. Other projects proposed in the 1985 Master Plan have either been completed or there is no longer a need to implement the project(s).

The arena roof project was identified in the 1985 Master Plan as part of the Capital Improvement Project No. 7 (Horse Arena). The Initial Study/Mitigated Negative Declaration (IS/MND) for the arena roof project was approved by the 22nd DAA Board of Directors in January 2008. Therefore, this project was assumed in the environmental review process under the proposed project and all of the build alternatives, including Alternative 2. Construction of this project was completed in spring 2009.

- 1. Electronic Reader Board Sign.** The proposed electronic reader board sign is consistent with the 1985 Master Plan Auxiliary Improvement Project No. 5 (Signage) to provide permanent communicating signs in the vicinity of the freeway accesses. The proposed electronic reader board sign is located along I-5 near the Via de la Valle southbound on-ramp and northbound off-ramp. Therefore, this project implements the intent of the 1985 Master Plan to provide additional signage and would proceed under Alternative 2.
- 2. Gate and Administration Building.** The proposed official gate and administration building is an updated version of the projects proposed in the 1985 Master Plan to provide a new administration building outside the secure perimeter of the Fairgrounds to allow easy access and year-round use of the facility during major events. The proposed project includes an updated main gate (ticket booth) facility, as this area has been identified in the 1985 Master Plan as an important location for site users. The proposed official gate and administration building is an updated version of Capital Improvement Projects No. 12 (Administration Building) and No. 13 (Gate House) and maintains the intent of these proposed 1985 Master Plan projects; therefore, this project would proceed under Alternative 2.
- 3. Truck Tunnel.** The proposed truck tunnel is an updated version of the pedestrian tunnel project proposed in the 1985 Master Plan (Capital Improvement Project No. 2). The 1985 Master Plan proposed construction of a second tunnel on the east end of the Racetrack to allow use of the infield for spectators during Race Meet and Fair events. While a pedestrian tunnel has already been constructed on the west end of the Racetrack, the 22nd DAA is now proposing to construct a new truck tunnel under the Racetrack to also allow for semitrucks, news trucks, and/or large vehicles to enter and exit the infield near the east end of the track. The proposed truck tunnel project is consistent with the intent of the 1985 Master Plan pedestrian tunnel project to improve conditions to make the infield an integral part of the Fair and Race Meet; therefore, this project would proceed under Alternative 2.
- 4. Backstretch Area Improvements.** The proposed improvements for the Backstretch Area are consistent with the intent of the Backstretch Stables project identified in the 1985 Master Plan projects (Capital Improvement Project No. 8). Improvements to the Backstretch Area occur as funds are available and are consistent with the approved 1985 Master Plan. Therefore, replacement of existing stables would proceed under Alternative 2.

In addition to the project listed above, the replacement sewer forcemain project would also be implemented on site under Alternative 2 since the IS/MND was approved by the Board of Directors in September 2008, and implementation is occurring outside of the 2008 Master Plan process. Water Quality BMPs would also be reasonably expected to be implemented at the time the new projects (identified above) are implemented, given new NPDES requirements; therefore, a reduced level of the water quality improvements of the proposed project would be assumed under Alternative 2.

Improvements that represent construction of new floor area that are not included in the earlier adopted Master Plans will not be included in Alternative 2. Specifically excluded are the proposed Health Club/Sports Training Facility, the proposed hotel and relocation of the fire station off site, the relocation of the maintenance buildings/yards, and surfacing of the East Parking Lot.

Attainment of Project Objectives. Alternative 2 would further the intent of several project objectives. For example, Alternative 2 would enhance the visitor experience by providing modern and functional facilities at the main ticket gate. Alternative 2 would also provide clear informational signage along I-5 and support existing uses, especially Horseracing, with construction of the tunnel and improvements to the Backstretch Area.

Alternative 2 would fail to meet several key project objectives. For example, Alternative 2 would not develop the facilities and operational programs to have a synergistic economic benefit for the Fairgrounds and adjacent communities. Alternative 2 projects consist of improvements to existing facilities; however, it does not include facilities that would support increased use of the project site during the Interim Season or that would lead to increased indirect economic benefits for the adjacent areas. Also, under implementation of Alternative 2, the Fairgrounds site would not be developed in a way that would address the needs of participants and patrons who require overnight stays in order to enable the successful operation of major events or modern exhibit hall space to support multiday conference/convention events. Overall, Alternative 2 would not make substantive contributions to the financial security of the Del Mar Fairgrounds for present and future generations, or support the continued success of Horseracing at the Fairgrounds by providing additional amenities for Racehorse owners and racing fans such as overnight residential accommodations on site. A more detailed summary of the attainment of project objectives under Alternative 2 is provided below.

- Alternative 2 does not represent a balance of permanent facilities and open, flexible-use areas that will support a wide range of activities relating to agriculture, education, entertainment, and recreation consistent with the 22nd DAA Mission Statement because new Master Plan projects, such as the hotel, exhibit halls, Health Club/Sports Training Facility, and East Parking Lot improvements would not be implemented.
- Alternative 2 does not create new opportunities for synergistic economic benefits to be realized by both the Fairgrounds and adjacent communities.
- With implementation of Alternative 2, the visitor experience at the Fairgrounds will not be enhanced with the provision of new and more modern exhibit space, more safe and efficient circulation with the Solana Gate improvements, more safe and convenient parking in the East Parking Lot, more modern and functional RV facilities, and the long-term habitat restoration of the South Lot.
- The Master Plan projects intended to support the continued success of Horseracing at the Fairgrounds by providing additional amenities for Racehorse owners and Race Meet-related staff would only be partially implemented. The new truck tunnel to improve access to the Racetrack infield and Backstretch improvements to replace aged stable structures would be implemented under this alternative, as they are improvements included in the 1985 Master Plan. However, the new Horseman's Village to support horse owners and staff during the Race Meet and the widening of the turf track to better accommodate turf Race Meets would not be realized with implementation of Alternative 2.

- The proposed hotel and new exhibit halls would not be constructed with implementation of Alternative 2. Therefore, Alternative 2 would not enhance the Fairgrounds attractiveness to conference planners by providing sufficient on-site hotel accommodations, dining facilities, and modern exhibit hall space to support multiday conference/convention events. Other improvements that would not occur with implementation of Alternative 2 include the new Health Club/Sports Training Facility. This alternative would not enhance the economic self-sustainability of the Fairgrounds by attracting a variety of events and users.
- With implementation of Alternative 2 there would be limited applicability of the requirements of the NPDES standards for storm water runoff, as the requirements are tied to new development.
- The only long-term projects that would be realized with implementation of Alternative 2 is the Backstretch Area improvements and the seasonal train platform. However, a new Horseman's Village would not be implemented to enhance the living and working environment for equestrians, horse owners, jockeys, horses, and other facility users. The long-term Master Plan project of constructing a seasonal train platform on site could occur under this alternative, since it would be implemented by an agency other than the 22nd DAA. Without the provision of a multilevel parking structure, full habitat restoration of the South Lot is not likely to occur, as there would still be a need for the overflow parking capacity provided in the South Lot.

Overall, Alternative 2 would not substantively further the intent of the project objectives to enhance the participant/patron experience of the Fairgrounds and to sustain the financial security of the Del Mar Fairgrounds for present and future generations.

Environmental Analysis.

Land Use. Alternative 2 would result in development of the project site with uses that are consistent with its existing use as a recreational facility. The proposed projects for Alternative 2 include the electronic reader board sign, the new gate and replacement administration building, a truck tunnel under the Racetrack, and improvements to the Backstretch Area. No change to the existing fire station would occur, and there would be no need for an off-site location for a replacement fire station. The proposed projects considered in this alternative are generally internal to the project site (not on the Fairgrounds periphery) and would be consistent with the surrounding land use patterns in the Cities of Del Mar and San Diego. No General Plan Amendments would be required for implementation of Alternative 2. Development of the projects identified for Alternative 2 would not block coastal access or impede access to the Coast to Crest Trail. Coastal Development Permits (CDPs) would be required prior to construction of each of the Alternative 2 projects.

Transportation. Alternative 2 would result in fewer additional vehicular trips compared to the proposed project. The trips that are specific to the Health Club/Sports Training Facility and the hotel/conference center would not be generated. The electronic reader board sign, the new gate, and a truck tunnel under the Racetrack are improvements that do not generate new vehicular trips. The replacement administration building is intended to serve the same number of 22nd DAA employees as currently report to the site, and the improvements to the Backstretch Area consist of replacing stables that are aged and deteriorating. Therefore, few to no additional trips would be

generated by these projects. Based on an estimate of the trip assignment for the reduced number of trips (by applying the percent of reduced trip generation for each alternative to the amount of delay for each intersection), the following intersections are expected to be significantly impacted for Alternative 2 (suggested mitigation is also listed with each impact):

- Intersection 3, Via de la Valle/Camino Del Mar: add westbound right-turn only lane (RTOL) phase and prohibit southbound U-turns
- Intersection 4, Via de la Valle/Solana Gate: install a traffic signal
- Intersection 5, Via de la Valle/Jimmy Durante Boulevard: construct westbound triple left-turn lanes on Via de la Valle to Jimmy Durante Boulevard, and modify striping on southbound Jimmy Durante Boulevard to accommodate three left-turn lanes
- Intersection 11, Jimmy Durante Boulevard/Main Gate: install a traffic signal
- Intersection 12, Jimmy Durante Boulevard/Office Gate/Fire Exit: install a traffic signal and left-turn lane
- Intersection 13, Jimmy Durante Boulevard/San Dieguito Drive: install a traffic signal
- Intersection 15, Camino Del Mar/13th Street: install a traffic signal
- Intersection 16, Camino Del Mar/11th Street: install a traffic signal

Implementation of traffic mitigation measures would be constrained as described in Section 4.2 for the proposed project. In conclusion, the traffic impacts of Alternative 2, while less than the proposed project, would still be significant and unavoidable.

Air Quality. The proposed project would have significant and unavoidable short-term construction air quality impacts as a result of ROG emissions, even after implementation of all feasible mitigation measures. Alternative 2 would result in reduced new construction compared to the proposed project, since the Health Club/Sports Training Facility, hotel/conference center, exhibit building, and fire station relocation projects would not be constructed. This reduction in new building would yield a net reduction in construction air emissions, including ROG, which is associated with the application of paint and architectural coating. Even with reduced construction, construction of the gate and administration building concurrently would still exceed the daily construction threshold for ROG. However, it is assumed that the 22nd DAA could schedule construction activity so that this exceedance could be avoided.

As described above, Alternative 2 would result in fewer additional vehicular trips compared to the proposed project, since the trips that are specific to the Health Club/Sports Training Facility and hotel/conference center would not be generated. Therefore, implementation of Alternative 2 would result in reduced PM₁₀ air emissions from vehicle trips compared to the proposed project. Operation of the new facilities proposed under Alternative 2 would result in an increase in energy consumption compared to existing conditions and a reduced increase in consumption compared to the proposed project.

For example, the electronic reader board sign and truck tunnel would consume energy for lighting. The new gate would replace an existing facility, and its energy use would be limited to

the hours of operation of ticket sales for major events. The improvements to the Backstretch Area consist of replacement of stables that are aged and deteriorating, and any additional energy use requirements would be minimal. The new administration building replaces an existing, outdated facility with a modern building that meets LEED-NC Silver standards, and therefore may realize net reduction in energy consumption. The proposed project includes the installation of solar panels on Maintenance Building Complex B, and the energy conservation realized by this project component would not be achieved with Alternative 2. However, the Backstretch improvements provide additional opportunities for the installation of solar panels in the replacement stables structures. This opportunity would be the same for the proposed project and Alternative 2. In all, operational air emissions from energy consumption for Alternative 2 would be limited; they would be more than existing conditions but substantially less than the proposed project.

In conclusion, operation of the proposed near-term projects would exceed the PM₁₀ daily emission threshold during the Interim Season; therefore, the proposed project would have significant long-term operational air quality impacts related to vehicle emissions. Because traffic from the Health Club/Sports Training Facility and hotel/conference center would not be generated, and increased energy use with this alternative is minimal compared to existing conditions, increases in operational emissions associated with Alternative 2 are minimal, and emissions of PM₁₀ would not exceed thresholds.

Unlike the proposed project, Alternative 2 would be developed consistent with the existing Master Plan in place at the time regional air quality modeling was concluded. Therefore, Alternative 2 would be considered consistent with adopted air quality plans (i.e., the San Diego Air Basin 2004 Triennial Regional Air Quality Strategy Revision).

Noise. Similar to the proposed project, construction of Alternative 2 would potentially expose sensitive receptors to short-term noise reaching 85 A-weighted decibels (dBA) maximum instantaneous levels (L_{max}) generated by construction activities near the project boundary; however, the opportunity to expose sensitive receptors is substantially reduced with Alternative 2 compared to the proposed project. For example, occupants of the existing Hilton Hotel would not be exposed to construction noise exceeding thresholds because the Health Club/Sports Training Facility would not be constructed. Existing residences along Via de la Valle (located approximately 100 ft from the Solana Gate entrance realignment) and the existing homes along Camino Del Mar (located approximately 350 ft from the exhibit hall construction site) would also not be exposed to similar noise levels during construction of Alternative 2 compared to the proposed project since the Solana Gate realignment, hotel, exhibit halls, and maintenance buildings would not be constructed. Noise levels would be greater than existing conditions for these residences from construction activities during improvements of the Backstretch Area. The application of Mitigation Measure 4.4.1 would reduce potential construction noise effects to below a level of significance.

Alternative 2 does not propose construction of the hotel and therefore the relocation of the existing fire station is not needed. Therefore, the significant effect of emergency vehicle siren noise associated with the new fire station is avoided with this alternative. Also, since Alternative 2 does not propose construction of the hotel, it would not result in new on-site sensitive noise receptors that would be introduced by the proposed project. Overall, reduced

demolition, grading, and construction activity would occur under Alternative 2, and the duration of the construction period would be shorter compared to the proposed project. Therefore, the volume/level of construction-related noise for Alternative 2 would be the less than the proposed project and shorter in duration.

Aesthetics. Although construction of Alternative 2 would alter the visual character of the project site compared to existing conditions, the change would be reduced compared to the proposed project since the hotel, new exhibit halls, new maintenance buildings, surfacing of the East Parking Lot, and the Solana Gate realignment would not occur under this alternative. New substantial sources of light that require mitigation under the proposed project would not be required under Alternative 2 since no rooftop sports fields would be constructed. In addition, most of the long-term projects would not be implemented under this alternative, including the potentially more visually dominant multilevel parking structure and seasonal train platform.

Construction of the new administration building, official ticket gate, and Backstretch facilities would change views from nearby roadways and neighborhoods. However, views of the project site from off-site locations are either not scenic, not protected public scenic views, or are at a distance where the scale of the projects is minimal in the overall view. Also, the new administration building and official gate would be designed with Mission-style architecture consistent with the existing design of the Racetrack and other buildings on the Fairgrounds.

Views of the ocean from off-site parks would be considered protected public scenic views. However, the nearby parks (i.e., Crest Canyon Open Space Park) with a view of the ocean beyond the project site are at much higher elevations than the low-lying Fairgrounds, and therefore the distant ocean views are not expected to be substantially affected by construction of the proposed projects under Alternative 2. Therefore, overall aesthetic impacts of Alternative 2 compared to the proposed project are somewhat reduced.

Biological Resources. Alternative 2 would require grading of portions of the project site; however, the area graded would be less than the proposed project. Because Alternative 2 does not include construction of the Health Club/Sports Training Facility or hotel, realignment of the Solana gate, or paving the East Parking Lot, no direct impacts to riparian habitat, sensitive natural communities, federally protected waters and wetlands, nor to potential California Department of Fish and Game (CDFG) and California Coastal Commission (CCC) jurisdictional areas identified for the proposed project would result from implementation of Alternative 2. Impacts to Belding's Savannah sparrow, nesting native birds, native and nonnative vegetation communities, and associated wildlife species would be reduced for Alternative 2 compared to the proposed project. Mitigation for the proposed multilevel parking structure, a long-term project under the proposed project, would result in full habitat restoration of the South Lot. The full restoration may not be realized with Alternative 2, since it does not include a parking structure to replace the existing overflow parking provided in the South Lot. In addition, no impacts to biological resources would occur at the off-site fire station site.

Cultural Resources. Alternative 2 would require grading of the site; however, the area graded would be smaller than necessary for the proposed project. Similar to the proposed project, Alternative 2 would not impact any known archaeological, historical, or paleontological resources on site; however, the possibility of discovering unknown archaeological or paleontological resources on site cannot be ruled out. Also, construction of Alternative 2 would not include construction of the hotel; therefore, the Clock Tower would not be demolished. Therefore, potential impacts to archaeological, historical, or paleontological resources are less for Alternative 2 than the proposed project.

Geology and Soils. Alternative 2 would require improvements on the same site as the proposed project and would therefore have similar levels of exposure to geologic and seismic impacts as the proposed project. Potential geologic hazards include impacts related to seismic ground shaking, liquefaction, landslides and slope stability, corrosive soil, ground settlement, and expansive soil. Potential impacts related to geologic hazards would be addressed through compliance with applicable Codes and regulations and with the recommendation of project-specific geotechnical studies for both the proposed project and Alternative 2.

Hazards and Hazardous Materials. Similar to the proposed project, Alternative 2 would require site grading and demolition of existing structures (existing gate and administrative structures). Therefore, construction of Alternative 2 would result in the same hazards associated with construction the proposed project. Potential hazards are those related to the possible discovery of unknown waste or suspect materials, as well as lead-based paint (LBP), asbestos-containing materials (ACM), and polychlorinated biphenyls (PCBs) on site during demolition, grading, excavation, or construction activities.

Population and Housing. The proposed project includes construction of the hotel, Horsemen's/groom's dormitory, and sewer hookup to the RV parking spaces. The proposed project would not eliminate housing and would not add new permanent housing units. Alternative 2 would not include construction of the horsemen's/groom's dormitory as a component of the Backstretch Improvements, and the sewer hookup to the RV parking spaces and the hotel project would not be implemented. Therefore, similar to the proposed project, Alternative 2 would not remove or add new permanent housing units. Compared to the proposed project, housing impacts are neutral, having no greater or lesser impact than the proposed project.

Hydrology and Water Quality. Development of Alternative 2 would not require the same extent of drainage system modifications or alteration of existing on-site drainage patterns that would occur with the proposed project. Overall, Alternative 2 would have less impact to existing on-site drainage patterns compared to the proposed project as a result of reduced grading and construction activity.

Larger drainage areas would be expected to remain the same for the entire project site with implementation of Alternative 2, and runoff would continue to drain generally from northeast to southwest, discharging at the existing discharge points. In addition, the majority of the proposed

improvements under Alternative 2 are the replacement of one impervious surface for another, which would result in only minor increases to on- and off-site flows. Similar to the proposed project, Alternative 2 would be expected to result in only a minor change in water surface elevation within the project limits during a 100-year flood event. Therefore, no discernable difference in effects to the larger area drainage patterns would take place with this alternative compared to the proposed project.

Water quality impacts of Alternative 2 would also be similar to the proposed project. Each project implemented under Alternative 2 would be required to comply with the General Construction Permit and prepare a Storm Water Pollution Prevention Plan (SWPPP) to identify Construction BMPs to be implemented to reduce impacts to water quality during construction, including those impacts associated with soil erosion. Similar pollutants would be anticipated in storm water runoff during operation of Alternative 2, compared to the proposed project. Water Quality BMPs are included as part of Alternative 2. Implementation of BMPs would provide additional treatment compared to existing conditions, which would result in a positive impact to storm water runoff quality as compared to existing conditions. However, Alternative 2 would include implementation of fewer BMPs because fewer projects are implemented compared to the proposed project. Therefore, more area of the project site would remain untreated under Alternative 2 compared to the proposed project. Given implementation of BMPs, the proposed project would result in greater improvements to water quality than Alternative 2.

Public Services and Utilities. The proposed project would impact fire protection services, water and wastewater services, and storm water services. Development of Alternative 2 would not introduce new uses to the site, and the long-term projects would not be implemented under Alternative 2; therefore, there would not be an increase in demand for water and wastewater services. Alterations to storm water drainage systems would be included with implementation of the projects under Alternative 2; however, fewer and smaller-scale projects are proposed under Alternative 2. Therefore, impacts to storm water services would be less than those realized under the proposed project. In addition, since the hotel complex would not be constructed under Alternative 2, impacts related to fire protection services and relocation of the fire station would not be realized under this alternative. Therefore, for these services, the proposed project has greater impacts to public services and utilities than Alternative 2. Since Alternative 2 would require less demolition and construction activity, construction-related debris would be less than that associated with the proposed project. Also, without the operation of a hotel and Health Club/Sports Training Facility, Alternative 2 would generate less waste operationally than the proposed project. Therefore, the incremental contribution to cumulative waste disposal shortfalls would be reduced with this alternative compared to the proposed project. Since Alternative 2 improvements do not involve the creation of substantial new uses of the site, the increase in solid waste is expected to be very small and would not result in a significant cumulative impact to County landfill capacity.

Recreation. The project site is currently developed as an approximately 300 ac area of Fairgrounds facilities, and future improvements are intended to provide visitor-serving uses and enhance the patron/visitor experience, the Fairgrounds attractiveness, and economic self-sustainability of the Fairgrounds. The proposed project would include construction of a new

exhibit hall, Health Club/Sports Training Facility, widened turf track, and hotel, thereby providing direct access to Fairground amenities to on-site guests and promoting additional recreational opportunities on site. Alternative 2 would not result in the construction of a new exhibit hall, Health Club/Sports Training Facility, widened turf track, and hotel that would promote the mission of the Del Mar Fairgrounds as a regional entertainment, recreational, cultural, and community asset. Therefore, Alternative 2 would not realize the same recreation benefits as the proposed project. Alternative 2 does not introduce new park users to the surrounding communities because it does not include new residential uses or result in additional employees on site; therefore, it would not cause an increase in use or physical deterioration of off-site recreational facilities. Also, Alternative 2 would not require construction or expansion of recreational facilities that might have an adverse physical effect on the environment.

Agricultural Resources. The project site is currently developed, and the California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP) has not identified Significant Farmland on site. Therefore, similar to the proposed project, implementation of Alternative 2 would neither directly nor indirectly convert Prime Farmland, Farmland of Statewide Importance, or Unique Farmland, otherwise known as "Significant Farmland," into nonagricultural uses. Therefore, agricultural resources impacts for Alternative 2 compared to the proposed project are neutral, having no greater or lesser impacts than the proposed project.

Mineral Resources. No known commercially valuable mineral resources exist on or near the project site. Similar to the proposed project, implementation of Alternative 2 would not result in the loss of availability of known mineral resources that would be considered valuable to the region or the residents of the State. Therefore, mineral resources impacts for Alternative 2 compared to the proposed project are neutral, having no greater or lesser impacts than the proposed project.

Greenhouse Gases and Energy. As described above, Alternative 2 would not result in substantial new additional vehicular trips compared to existing conditions since the trips that are specific to the Health Club/Sports Training Facility and hotel/conference center would not be generated.¹ Therefore, implementation of Alternative 2 would not result in increased carbon dioxide (CO₂) emissions from vehicle trips. Operation of the new facilities proposed under Alternative 2 would result in a minimal increase in energy consumption compared to existing conditions and a reduced increase in consumption compared to the proposed project. Therefore, GHG emissions associated with energy production for use by Alternative 2 projects would be minimal. The new administration building replaces an existing dated facility with a modern building that meets LEED-NC Silver standards and therefore may realize net reduction in energy consumption. Therefore, operational air emissions from energy consumption by this alternative would be limited; they would be more than existing conditions but substantially less than the proposed project. Construction emissions of GHG emissions from construction equipment and construction worker commutes would be short-term for the duration of

¹ The proposed seasonal train platform would not be implemented under this alternative; therefore, the VMT reduction from increased use of transit would not be realized.

construction activity and less than the proposed project due to the reduced levels of construction associated with this alternative. Therefore, GHG emissions associated with the implementation of Alternative 2 are slightly greater than existing conditions but substantially less than the proposed project. Since the threshold for significance is whether or not the project, or in this case, Alternative 2, results in an increase in GHG emissions above current levels for the project site, Alternative 2 is considered to result in emissions that are cumulatively considerable.

Conclusion. Alternative 2 would enhance the visitor experience by providing modern and functional facilities at the main ticket gate, provide clear informational signage along I-5, and support existing uses with construction of the tunnel and improvements to the Backstretch Area. However, Alternative 2 would not meet several key project objectives. For example, Alternative 2 would not develop the facilities and operational programs to have a synergistic economic benefit for the Fairgrounds and adjacent communities. Alternative 2 projects consist of improvements to existing facilities and would not support increased use of the project site during the Interim Season that would lead to increased indirect economic benefits for the adjacent areas. Also, with implementation of Alternative 2, the Fairgrounds site would not be developed in a way that would address the needs of participants and patrons who require overnight stays in order to enable the successful operation of major events or modern exhibit hall space to support multiday conference/convention events. Overall, Alternative 2 would not help sustain the financial security of the Del Mar Fairgrounds for present and future generations or support the continued success of Horseracing at the Fairgrounds by providing additional amenities for Racehorse owners and racing fans such as short-term residential accommodations on site.

The significant project impacts related to construction air quality and cumulative impacts related to global climate change would not be avoided under this alternative, but would be reduced. The significant project impacts related to traffic, operational air quality, and cumulative waste disposal shortfalls would be avoided under Alternative 2. This alternative would also result in reduced impacts for noise and biological resources compared with the proposed project.

5.5.3 Reduced Project/No Hotel (Alternative 3)

Reduced Project/No Hotel (Alternative 3). The Reduced Project/No Hotel Alternative (Alternative 3) evaluates the impacts of the Master Plan projects, excluding the construction of the hotel complex. Alternative 3 assumes implementation of all of the near-term and long-term projects proposed in the 2008 Master Plan except for the hotel, and subsequently, not the relocation of the fire station; therefore, construction of the Health Club/Sports Training Facility, exhibit buildings, realignment of Solana Gate, pavement of the existing dirt lot, and the remaining near-term and long-term projects are assumed under Alternative 3.

Attainment of Project Objectives. Alternative 3 would attain the majority of the 22nd DAA's Master Plan objectives; however, because the hotel would not be constructed with implementation of Alternative 3, the objectives to provide overnight stays on site for participants and patrons like Racehorse owners, racing fans, or conference/convention events would not be fully met. The Fairgrounds would expand its service hook-ups at the Surf and Turf property for RV parking spaces, and the existing RV parking spaces with hook-ups would remain in place because the hotel would not

be constructed. Therefore, potential on-site accommodations would be provided at the Fairgrounds, but not to the extent of a hotel complex. A more detailed summary of the attainment of project objectives under Alternative 3 is provided below.

- Alternative 3 represents a balance of permanent facilities (exhibit halls, Health Club/Sports Training Facility) and open, flexible-use areas (East Parking Lot, other parking areas) that will support a wide range of activities relating to agriculture, education, entertainment, and recreation consistent with the 22nd DAA Mission Statement.
- Alternative 3 would not promote better year-round use of the Fairgrounds, expanding the number of days per year that events are occurring on site and opportunities for synergistic economic benefits to be realized by both the Fairgrounds and for adjacent communities. The visitor experience at the Fairgrounds will be enhanced with the provision of new and more modern exhibit space, the Solana Gate improvements, improved parking in the East Parking Lot, improved RV facilities, and signage on I-5. However, it is not anticipated that the Fairgrounds would increase in the number of year-round activities, particularly on weekdays, without the provision of a hotel to support conferences and trade shows in the Interim Season.
- Implementation of Alternative 3 would include the new truck tunnel to improve access to the Racetrack infield, Backstretch improvements, the new Horseman's Village to support horse owners and staff during the Race Meet, and the widening of the turf track to better accommodate turf Race Meets. These projects support the continued success of Horseracing at the Fairgrounds by providing additional amenities for Racehorse owners and Race Meet-related staff. However, other components of the Master Plan, specifically the hotel, would not be implemented, and the objective of providing overnight accommodations on site to support the Race Meet would not be attained.
- The attractiveness of the Fairgrounds to conference planners will be limited under this alternative because, although new exhibit halls would be provided, the on-site hotel accommodations and dining facilities to support multiday conference/convention events would not be implemented.
- Alternative 3, including the new Health Club/Sports Training Facility and replacement exhibit halls, are expected to enhance the economic self-sustainability of the Fairgrounds by attracting a variety of events and users to a certain extent, but not to the same extent as the proposed project because the successful operation of some major events would not occur without the provision of on-site accommodations.
- Alternative 3 projects are consistent with the existing General Plan and Community Plan designations for surrounding uses, as described in Section 4.1 of this EIR.
- Construction plans for Alternative 3 projects will comply with and ensure implementation of appropriate BMPs to meet NPDES standards for storm water runoff, resulting in a net improvement to water quality compared to existing conditions, as described in Section 4.11 of this EIR.
- Implementation of Alternative 3 projects will result in coordination with other agencies, including but not limited to the City of Del Mar, to ensure that the plans are consistent with existing infrastructure.

- The Mitigation Strategy of completing habitat restoration of the South Lot (see Section 4.6 of this EIR) supports the actions by other public and quasipublic agencies to implement an open space system along the San Dieguito River in a manner that does not impede day-to-day operations at the Fairgrounds.
- The long-term projects would be implemented under Alternative 3. Construction of a seasonal train platform on site is a key implementation of the project objective of improving transit service to the Fairgrounds. The provision of a multilevel parking structure to allow full habitat restoration of the South Lot will ensure the continued availability of adequate on-site parking at the Fairgrounds. As noted above, implementation of improvements to the Backstretch Area, including replacement stables structures and a new Horseman's Village, will enhance the living and working environment for equestrians, horse owners, jockeys, horses, and other facility users.

The improvements to Fairgrounds and Race Meet facilities are intended to enhance the participant/patron experience of the Fairgrounds by providing safe, modern, and efficient facilities for Fair vendors as well as equestrians, horse owners, jockeys, horses, and other facility users. Overall, the Alternative 3 projects would enhance the participant/patron experience and help sustain the financial security of the Del Mar Fairgrounds for present and future generations but to a lesser extent than the proposed project.

Environmental Analysis.

Land Use. Alternative 3 would result in development of the project site with uses that are consistent with its existing use as a recreational facility. The proposed projects considered in this alternative would be consistent with the surrounding land use patterns in the Cities of Del Mar and San Diego, and no General Plan Amendments would be required. Alternative 3 would not require relocation of the fire station off site; therefore, issuance of a Local Coastal Development Permit (LCDP) would not be required. However, CCC-issued CDPs would be necessary for the Alternative 3 projects. No physical changes would occur at the proposed fire station site, and overall impacts to land use would be slightly less under Alternative 3 compared to the proposed project.

Transportation. Alternative 3 would result in fewer vehicular trips than the proposed project since the trips that are specific to the hotel complex would not be generated. The proposed project generates 6,960 average daily trips (ADT) on weekdays and 7,170 ADT on weekends in the Interim Season. The Reduced Project/No Hotel Alternative (Alternative 3) does not include the proposed hotel, which would reduce the trip generation to 3,020 ADT on weekdays and 3,010 ADT on weekends in the Interim Season. Based on an estimate of the trip assignment for the reduced number of trips (by applying the percent of reduced trip generation for each alternative to the amount of delay for each intersection), the following intersections are expected to be significantly impacted for Alternative 3 (recommended mitigation is included for each impact where it has been identified):

- Intersection 3, Via de la Valle/Camino Del Mar: add westbound RTOL phase and prohibit southbound U-turns

- Intersection 4, Via de la Valle/Solana Gate: install a traffic signal
- Intersection 5, Via de la Valle/Jimmy Durante Boulevard: construct westbound triple left-turn lanes on Via de la Valle to Jimmy Durante Boulevard and modify striping on southbound Jimmy Durante Boulevard to accommodate three left-turn lanes
- Intersection 6, Via de la Valle/I-5 SB ramps
- Intersection 7, Via de la Valle/I-5 NB ramps
- Intersection 11, Jimmy Durante Boulevard/Main Gate: install a traffic signal
- Intersection 12, Jimmy Durante Boulevard/Office Gate/Fire Exit: install a traffic signal and left-turn lane
- Intersection 13, Jimmy Durante Boulevard/San Dieguito Drive: install a traffic signal
- Intersection 15, Camino Del Mar/13th Street: install a traffic signal
- Intersection 16, Camino Del Mar/11th Street: install a traffic signal
- Intersection 18, Camino Del Mar/Del Mar Heights Road: add an overlap phase to the traffic signal

Implementation of traffic mitigation measures would be constrained as described in Section 4.2, Traffic and Circulation, for the proposed project. In conclusion, traffic impacts of Alternative 3, while less than the proposed project, would still be significant and unavoidable. The Health Club/Sports Training Facility would still be generating daily trips estimated at 2,400 ADT on weekdays and 1,260 ADT on weekends in the Interim Season.

Air Quality. The proposed project would have significant, unavoidable short-term construction air quality impacts as a result of ROG emissions, even after implementation of all feasible mitigation measures. Alternative 3 would result in slightly less site construction since the hotel/conference center (including semisubterranean parking) and fire station relocation would not be constructed. This reduction in building activity would yield a net reduction in construction air emissions. However, even with reduced construction of buildings, exceedances of the daily ROG construction emissions thresholds would occur with Alternative 3 because construction of the maintenance buildings alone would result in significant short-term impacts.

As described above, Alternative 3 would result in fewer vehicular trips than the proposed project, since the trips that are specific to the hotel/conference center would not be generated. Therefore, there would be a commensurate decrease in air emissions from vehicle trips generated. Operation of the proposed project would exceed the PM₁₀ daily emission threshold during the Interim Season; therefore, the proposed project would have significant operational air quality impacts related to vehicle emissions. Although Alternative 3 would result in reduced emissions compared with the proposed project, PM₁₀ emissions would still result in significant operational air quality impacts.

Similar to the proposed project, Alternative 3 is not consistent with the adopted Master Plan for the site, and Alternative 3 projects may not be reflected in the regional air quality modeling.

Therefore, Alternative 3 would be inconsistent with adopted air quality plans (i.e., the San Diego Air Basin 2004 Triennial Regional Air Quality Strategy Revision).

Noise. Construction noise levels would be similar to the proposed project since a similar amount of demolition, grading, and construction would occur. Similar to the proposed project, construction of Alternative 3 would potentially expose sensitive receptors to short-term noise reaching 85 dBA L_{max} , generated by construction activities near the project boundary. Occupants of the existing Hilton Garden hotel (which is located approximately 240 ft from the proposed Health Club/Sports Training Facility construction site), the existing residences along Via de la Valle (located approximately 100 ft from the Solana Gate entrance realignment), and the existing homes along Camino Del Mar (located approximately 350 ft from the exhibit hall construction site) would be exposed to similar noise levels during construction of both Alternative 3 and the proposed project. These impacts would be potentially significant and adverse; however, they would be reduced compared to the proposed project because Alternative 3 does not include demolition of the existing fire station, construction of a new fire station, and construction of the hotel. Alternative 3 would comply with the local noise ordinances to reduce construction-related noise impacts to sensitive receptors. The application of Mitigation Measure 4.4.1 would reduce potential construction noise effects to below a level of significance. Therefore, construction-related noise impacts of Alternative 3 and the proposed project would be similar.

Alternative 3 does not propose construction of the hotel and therefore would not result in new on-site sensitive noise receptors (hotel rooms and hotel pool) that would be introduced by the proposed project. Also, the existing fire station is not relocated with this Alternative, and the significant effect of emergency vehicle siren noise from new fire station is avoided with this Alternative.

Aesthetics. Similar to the proposed project, construction of Alternative 3 would alter the visual character of the project site compared to existing conditions. Construction of the proposed long-term projects, specifically the multilevel parking structure and seasonal train platform, would change views from nearby roadways and neighborhoods. The proposed hotel structure is architecturally consistent with the existing Grandstands and Fairgrounds facilities; however, the elimination of the hotel from Alternative 3 results in reduced building mass in the southwest portion of the Fairgrounds. Views of the project site from off-site locations are either not scenic, not protected public scenic views, or at a distance where the scale of the projects is minimal in the overall view of the site. Views of the ocean from off-site parks would be considered protected public scenic views. The nearby parks (i.e., Crest Canyon Open Space Park) with a view of the ocean beyond the project site are at much higher elevations than the low-lying Fairgrounds; therefore, the distant ocean views are not expected to be substantially affected by construction of the train platform and multilevel parking structure. Mitigation for new sources of substantial light would still be required under Alternative 3 since the rooftop sport fields for the Health Club/Sports Training Facility and exhibit halls would still be constructed. Therefore, aesthetic impacts of Alternative 3 compared to the proposed project are similar to and slightly less than the proposed project.

Biological Resources. Alternative 3 would require grading of the site; however, the area graded would be slightly less than the proposed project. Because the area of grading for the new exhibit buildings is smaller than the grading footprint that included the hotel, the impacts to Diegan coastal sage scrub and southern coastal salt marsh adjacent to the San Dieguito River would be reduced under Alternative 3. Impacts to native and nonnative vegetation communities and associated wildlife species would occur, but would be slightly reduced, as the total developed area would be smaller. Additionally, no impacts to biological resources would occur at the off-site fire station site. Under Alternative 3, impacts to Belding's Savannah sparrow, federally protected waters and wetlands, and potential CDFG and CCC jurisdictional areas would be similar to those identified for the proposed project.

Cultural Resources. Alternative 3 would require grading on site; however, the area graded would be smaller than the grading footprint for the proposed project. Similar to the proposed project, Alternative 3 would not impact any known archaeological, historical, or paleontological resources on site; however, the possibility of discovering unknown archaeological or paleontological resources on site cannot be ruled out. Both Alternative 3 and the proposed project require the demolition of the Bing Crosby Hall (1951), the Don Diego Clock Tower (1953) (although elements of the Clock Tower, such as decorative tile, will be retained and used on site), and the Exhibit Hall (1955). These resources are not considered to be significant, and overall impacts to cultural resources are the same for Alternative 3 as for the proposed project.

Geology and Soils. Alternative 3 would require improvements on the same site as the proposed project, and would therefore have similar levels of exposure geologic and seismic impacts as the proposed project. Potential geologic hazards include impacts related to seismic ground shaking, liquefaction, landslides and slope stability, corrosive soil, ground settlement, and expansive soil. Potential impacts related to geologic hazards would be addressed through compliance with applicable codes and regulations for both the proposed project and Alternative 3.

Hazards and Hazardous Materials. Similar to the proposed project, Alternative 3 would require site grading and demolition of existing structures. Therefore, construction of Alternative 3 would result in the same hazards associated with construction of the proposed project. Potential hazards are those related to the possible discovery of unknown waste or suspect materials, as well as LBP, ACM and PCBs on site during demolition, grading, excavation, or construction activities.

Population and Housing. The proposed project includes construction of the hotel, replacement of stables with temporary living quarters as needed, and sewer hookup to the RV parking spaces and would not eliminate housing or add new permanent housing units. Alternative 3 would include construction of the replacement stables with temporary living quarters as needed, and sewer hookup to the RV parking spaces but would not include construction of the hotel. Similar to the proposed project, Alternative 3 would not remove or add new permanent housing units. Therefore, housing impacts compared to the proposed project are neutral, having no greater or lesser impacts than the proposed project.

Hydrology and Water Quality. Development of the project site under Alternative 3 would require drainage system modifications, as does the proposed project. Similar to the proposed project, Alternative 3 would result in a slight alteration of existing drainage patterns due to changes in imperviousness and new area drain systems. However, the larger drainage areas and existing storm drain facilities would be expected to 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. In addition, the majority of the proposed improvements are the replacement of one impervious surface for another, which would result in only minor increases to on- and off-site flows. Similar to the proposed project, Alternative 3 would be expected to result in only a minor change in water surface elevation within the project limits during a 100-year flood event. Therefore, no discernable difference in effects on surface hydrology would take place with this alternative compared to the proposed project.

Water quality impacts of Alternative 3 would also be similar to the proposed project. Each project implemented under Alternative 3 would be required to comply with the General Construction Permit and have a SWPPP prepared to identify Construction BMPs to be implemented to reduce impacts to water quality during construction, including those impacts associated with soil erosion. Similar pollutants would be anticipated in storm water runoff during operation of Alternative 3, compared to the proposed project. Water Quality BMPs are included as part of Alternative 3. Implementation of BMPs would provide additional treatment compared to existing conditions, which would result in a positive impact to storm water runoff quality as compared to existing conditions. However, Alternative 3 would include implementation of fewer BMPs, and more area of the project site would remain untreated under Alternative 3 compared to the proposed project. Given implementation of BMPs, the proposed project would result in slightly greater improvements to water quality than Alternative 3.

Public Services and Utilities. Similar to the proposed project, Alternative 3 would impact water and wastewater services, as well as storm water services. However, because Alternatives 3 does not include construction of the hotel complex, impacts related to fire protection services and relocation of the fire station would not occur under this alternative. Impacts to water and wastewater services, as well as storm water services, would still occur under Alternative 3 because the alternative still includes construction of the remaining near-term projects, including the Health Club/Sports Training Facility, as well as the long-term projects. Alternative 3 would require less demolition and construction activity because the demolition to accommodate the hotel would not be required, and the hotel and new fire station construction would not occur. Therefore, construction-related debris would be less than that associated with the proposed project. Also, without the operation of a hotel, Alternative 3 would generate less waste operationally than the proposed project. Therefore, the incremental contribution to cumulative waste disposal shortfalls would be reduced with this alternative compared to the proposed project. Since Alternative 3 improvements would allow for new land uses on the Fairgrounds site, including the Health Club/Sports Training Facility and exhibit buildings, the increase in solid waste is expected to be greater than existing conditions and would result in a significant cumulative impact to County landfill capacity. Impacts under Alternative 3 would be slightly less than the proposed project because the hotel demand would not be realized. Therefore, the proposed project has greater impacts to public services and utilities than Alternative 3.

Recreation. The project site is currently developed. Being located on approximately 300 ac area of Fairgrounds, future improvements are intended to provide visitor-serving uses and enhance the patron/visitor experience, the Fairgrounds attractiveness, and economic self-sustainability of the Fairgrounds. Alternative 3 would include construction of a new exhibit hall and Health Club/Sports Training Facility, as well as widening the turf track, which would promote the mission of the Del Mar Fairgrounds as a regional entertainment, recreational, cultural, and community asset. However, Alternative 3 would not include construction of a hotel. The proposed project would include construction of a hotel, thereby providing direct access to Fairground amenities to on-site guests. Alternative 3 would result in some additional on-site employees from the Health Club/Sports Training Facility; however, these employees are not expected to utilize nearby recreation facilities (i.e., Coast to Crest Trail) in numbers that would result in substantial deterioration of nearby recreation facilities. Therefore, Alternative 3 would not cause an increase in use or physical deterioration of off-site recreational facilities. Also, Alternative 3 would not require construction or expansion of recreational facilities that might have an adverse physical effect on the environment.

Agricultural Resources. The project site is currently developed, and the California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP) has not identified Significant Farmland on site. Therefore, similar to the proposed project, implementation of Alternative 3 would neither directly nor indirectly convert Prime Farmland, Farmland of Statewide Importance, or Unique Farmland, otherwise known as "Significant Farmland," into nonagricultural uses. Therefore, agricultural resources impacts for Alternative 3 compared to the proposed project are neutral.

Mineral Resources. No known commercially valuable mineral resources exist on or near the project site. Similar to the proposed project, implementation of Alternative 3 would not result in the loss of availability of known mineral resources that would be considered valuable to the region or the residents of the State. Therefore, mineral resource impacts for Alternative 3 compared to the proposed project are neutral.

Greenhouse Gases and Energy. The proposed near-term projects included in Alternative 3 will result in the replacement of older, less-efficient structures with more energy-efficient buildings. However, the net increase in building area and increase in vehicular trips will result in a net increase in GHG emissions compared to existing conditions. Implementation of LEED-NC Silver certification standards, project components such as a seasonal train platform, and mitigation measures described in Section 4.16 of this EIR cannot fully offset the emissions resulting from implementation of Alternative 3. Therefore, although less than the proposed project, the total emissions for Alternative 3 exceed current levels and are considered to be cumulatively considerable.

Conclusion. Alternative 3 would attain the majority of the 22nd DAA's Master Plan objectives; however, because the hotel would not be constructed with implementation of Alternative 3, the objectives to provide overnight stays on site for participants and patrons such as Racehorse owners, racing fans, or conference/conventions events would not be fully met. The attractiveness of the Fairgrounds to conference planners will be limited under this Alternative because, although new exhibit halls would be provided, the on-site hotel accommodations and dining facilities to support multiday conference/convention events would not be implemented. Alternative 3, including the new Health Club/Sports Training Facility and replacement exhibit halls, are expected to enhance the economic self-sustainability of the Fairgrounds by attracting a variety of events and users to a certain extent, but not to the same extent as the proposed project because the successful operation of some major events would not occur without on-site accommodations. Overall, Alternative 3 projects would enhance the participant/patron experience and help sustain the financial security of the Del Mar Fairgrounds for present and future generations, but to a lesser extent than the proposed project.

The significant project impacts related to construction and operational air quality, cumulative waste disposal shortfalls, and GHG emissions would not be avoided under this alternative. This alternative would result in reduced impacts for traffic and noise that are reduced when compared to the proposed project but still significant and unavoidable.

5.6 IDENTIFICATION OF ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The No Project/No Development Alternative (Alternative 1) would be environmentally superior to the proposed project on the basis of the physical impacts that would occur with Alternative 1. If there were no changes to the existing conditions on site, there would be no increase in traffic, noise, construction or operational air emissions, or GHG emissions, and the significant effects of the project would be avoided.

Similarly, the No Project/Existing Master Plan Alternative (Alternative 2) has substantially reduced impacts overall compared to the proposed project; however, significant impacts related to traffic would not be fully avoided. While the improvement projects identified in the 1985 Master Plan would be implemented, the existing Master Plan projects improve Fairgrounds facilities but do not introduce new land uses that would generate substantial amounts of additional traffic, air, emissions, noise, or solid waste. Neither the No Project/No Development (Alternative 1) nor the No Project/Existing Master Plan (Alternative 2) alternatives fulfill the project objectives. However, GHG emissions would increase compared to existing conditions, and construction air quality impacts would remain significant.

The CEQA Guidelines require that if the environmentally superior alternative is the No Project/No Development Alternative, "the EIR also identify an environmentally superior alternative among the other alternatives" (CEQA Guidelines Section 15126.6[e][2]). The Environmentally Superior Alternative, in terms of direct physical effects on the environment, is the Reduced Project Alternative (Alternative 3).

The Reduced Project Alternative (Alternative 3) does not include the proposed hotel and fire station relocation. This alternative would implement the other improvements at the Fairgrounds planned as part of the proposed project, including the Health Club/Sports Training Facility, exhibit buildings,

and the realignment of Solana Gate. The Reduced Project Alternative (Alternative 3) would result in reduced construction and operational impacts compared to the proposed project.

The Reduced Project Alternative (Alternative 3) meets most of the project objectives, but not to the same extent as the proposed project. The Reduced Project Alternative (Alternative 3) does not include the hotel; therefore, this alternative would not realize the objective of providing overnight stays on site for participants and patrons such as Racehorse owners, racing fans, or conference/convention events. The attractiveness of the Fairgrounds to conference planners will be limited under this alternative because, although new exhibit halls would be provided, the on-site hotel accommodations and dining facilities to support multiday conference/convention events would not be implemented. Overall, Alternative 3 projects would help sustain the financial security of the Del Mar Fairgrounds for present and future generations, but to a lesser extent than the proposed project.

Significant impacts related to traffic would not be fully avoided with Alternative 3. The number of significant impacts to intersections/ramps would be reduced from 13 to 11 when compared to the proposed project since implementation of traffic mitigation is outside the control of the 22nd DAA. The implementation of mitigation improvements is not assumed, and all potentially significant traffic impacts are considered significant and unavoidable.

The significant project impacts related to construction and operational air quality and GHG emissions would not be avoided under this alternative. This alternative would result in reduced impacts for traffic compared with the proposed project; however, the alternative would still result in significant traffic impacts. The incremental contribution to cumulative waste disposal shortfalls would also be reduced compared to the proposed project, but would still be significant and unavoidable.

Alternative 3 does not include construction of the proposed hotel; therefore, the relocation of the fire station is not warranted. There would be no change to existing emergency vehicle siren noise from the fire station with this alternative, and the significant siren noise impact would be avoided.

Although the Reduced Project Alternative (Alternative 3) would reduce the duration of the project construction emissions, it would still result in significant construction-related air quality emission impacts. Therefore, the Reduced Project Alternative (Alternative 3) results in reduced significant, unavoidable adverse effects compared to the proposed project. The Reduced Project Alternative (Alternative 3) would also result in reduced overall construction impacts for water quality, hazardous materials, and recreation compared with the proposed project because hotel construction would not occur with this alternative. However, impacts related to these topics would still result in less than significant impacts, as would the proposed project.

Table 5.A provides a comparison of the key impacts of the alternatives, and Table 5.B provides a comparison of the project alternatives relative to the significant adverse impacts of the proposed project.

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Table 5.A: Alternatives Comparison Matrix

Issue Topic	Proposed Project	No Project/No Development (Alternative 1)	No Project/Existing Master Plan (Alternative 2)	Reduced Project/No Hotel (Alternative 3)
Characteristics	<ul style="list-style-type: none"> • Implementation of the 2008 Master Plan 	<ul style="list-style-type: none"> • Existing condition/No development 	<ul style="list-style-type: none"> • Implementation of the following 2008 Master Plan near-term projects: <ul style="list-style-type: none"> ○ Electronic reader board sign ○ Gate and administration building ○ Truck tunnel ○ Backstretch Area improvements • No long-term projects implemented 	<ul style="list-style-type: none"> • Implementation of the 2008 Master Plan, excluding the construction of the Hotel complex, which would subsequently not require relocation of the existing fire station
Meets Project Objectives	<ul style="list-style-type: none"> • Meets all project objectives 	<ul style="list-style-type: none"> • Would not satisfy any project objectives 	<ul style="list-style-type: none"> • Would further near-term objective to enhance visitor experience (Objective 2) and support continued success of Horseracing at the Fairgrounds (Objective 7) • Would satisfy long-term objective to implement improvements to the Backstretch Area (Objective 3) 	<ul style="list-style-type: none"> • Would not satisfy near-term objectives to provide on-site hotel accommodations or dining facilities to support multiday conference/convention events (Objective 4), to provide overnight stays to patrons in order to enable the successful operation of major events (Objective 5), or to provide additional amenities to Racehorse owners and racing fans such as short-term residential accommodations (Objective 7)

Table 5.A: Alternatives Comparison Matrix

Issue Topic	Proposed Project	No Project/No Development (Alternative 1)	No Project/Existing Master Plan (Alternative 2)	Reduced Project/No Hotel (Alternative 3)
Land Use	<ul style="list-style-type: none"> • Could require issuance of a Local Coastal Development Permit (LCDP) by the City of Del Mar for the proposed fire station • Requires acquisition of the fire station site (Parcels 30/31) • Less than significant impact with mitigation to on-site and surrounding uses during construction • Less than significant operational impact to land use 	<ul style="list-style-type: none"> • No change to existing conditions of site 	<ul style="list-style-type: none"> • Does not require issuance of an LCDP by the City of Del Mar • Does not require acquisition of the fire station site (Parcels 30/31) • Less than significant impact with mitigation to on-site and surrounding uses during construction 	<ul style="list-style-type: none"> • Does not require issuance of an LCDP by the City of Del Mar • Does not require acquisition of the fire station site (Parcels 30/31) • Less than significant impact to on-site and surrounding uses during construction with mitigation
Transportation	<p>The proposed project would result in significant traffic and circulation impacts at the following locations:</p> <ul style="list-style-type: none"> • Intersections: <ul style="list-style-type: none"> ○ Lomas Santa Fe Drive/ Highway 101 ○ Via de la Valle/Camino Del Mar ○ Via de la Valle/Solana Gate ○ Via de la Valle/Jimmy Durante Boulevard ○ Via de la Valle/I-5 SB ramps ○ Via de la Valle/I-5 NB 	<ul style="list-style-type: none"> • No additional traffic generated • No significant impacts to traffic or circulation conditions 	<ul style="list-style-type: none"> • Fewer additional vehicular trips compared to proposed project <p>The following intersections are expected to be significantly impacted for Alternative 2:</p> <ul style="list-style-type: none"> • Intersection 3, Via de la Valle/ Camino Del Mar • Intersection 4, Via de la Valle/ Solana Gate • Intersection 5, Via de la Valle/ Jimmy Durante Boulevard • Intersection 11, Jimmy Durante Boulevard/Main Gate • Intersection 12, Jimmy Durante Boulevard/Office Gate/Fire Exit • Intersection 13, Jimmy Durante 	<ul style="list-style-type: none"> • Fewer additional vehicular trips compared to proposed project <p>The following intersections are expected to be significantly impacted for Alternative 3 (recommended mitigation is included for each impact where it has been identified):</p> <ul style="list-style-type: none"> • Intersection 3, Via de la Valle/ Camino Del Mar • Intersection 4, Via de la Valle/ Solana Gate • Intersection 5, Via de la Valle/ Jimmy Durante Boulevard • Intersection 6, Via de la Valle/I-5 SB ramps • Intersection 7, Via de la Valle/I-5

Table 5.A: Alternatives Comparison Matrix

Issue Topic	Proposed Project	No Project/No Development (Alternative 1)	No Project/Existing Master Plan (Alternative 2)	Reduced Project/No Hotel (Alternative 3)
	<p>ramps</p> <ul style="list-style-type: none"> ○ Via de la Valle/El Camino Real West ○ Jimmy Durante Boulevard/Main Gate ○ Jimmy Durante Boulevard/Office Gate/Fire Exit ○ Jimmy Durante Boulevard/San Dieguito Drive ○ Camino Del Mar/13th Street ○ Camino Del Mar/11th Street ○ Camino Del Mar/Del Mar Heights Road • Street Segments: <ul style="list-style-type: none"> ○ Camino Del Mar. Jimmy Durante Boulevard to 15th ○ Camino Del Mar. 15th Street to 11th Street ○ Via de la Valle. Jimmy Durante Boulevard to I-5 SB ramps ○ Via de la Valle EB to I-5 SB ramps • Ramp Meters: <ul style="list-style-type: none"> ○ Via de la Valle EB to I-5 NB ramp 		<p>Boulevard/San Dieguito Drive</p> <ul style="list-style-type: none"> • Intersection 15, Camino Del Mar/13th Street • Intersection 16, Camino Del Mar/11th Street 	<p>NB ramps</p> <ul style="list-style-type: none"> • Intersection 11, Jimmy Durante Boulevard/Main Gate • Intersection 12, Jimmy Durante Boulevard/Office Gate/Fire Exit • Intersection 13, Jimmy Durante Boulevard/San Dieguito Drive • Intersection 15, Camino Del Mar/13th Street • Intersection 16, Camino Del Mar/11th Street • Intersection 18, Camino Del Mar/Del Mar Heights Road

Table 5.A: Alternatives Comparison Matrix

Issue Topic	Proposed Project	No Project/No Development (Alternative 1)	No Project/Existing Master Plan (Alternative 2)	Reduced Project/No Hotel (Alternative 3)
	<ul style="list-style-type: none"> ○ Via de la Valle EB to I-5 SB ramp 			
Air Quality	<ul style="list-style-type: none"> • Significant unavoidable impacts related to PM₁₀ and ROG emissions during construction • Significant unavoidable impacts related to PM₁₀ emissions during operation • Inconsistent with SANDAG forecast and the RAQS 	<ul style="list-style-type: none"> • No additional air quality emissions generated compared to existing conditions • Consistent with SANDAG forecast and the RAQS 	<ul style="list-style-type: none"> • Significant unavoidable impacts related to PM₁₀ and VOC emissions during construction • No significant unavoidable impacts related to PM₁₀ emissions during operation • Consistent with SANDAG forecast and the RAQS 	<ul style="list-style-type: none"> • Significant unavoidable impacts related to PM₁₀ and VOC emissions during construction • No significant unavoidable impacts related to PM₁₀ emissions during operation • Inconsistent with SANDAG forecast and the RAQS
Noise	<ul style="list-style-type: none"> • Less than significant impacts with mitigation as a result of construction noise • New on-site sensitive noise receptors • Significant impact from emergency vehicle sirens 	<ul style="list-style-type: none"> • No additional noise generated compared to existing conditions • No new on-site sensitive noise receptors • Avoids significant impact from emergency vehicle sirens 	<ul style="list-style-type: none"> • Substantially reduced volume/level of construction-related noise compared to proposed project, and shorter duration • No new on-site sensitive noise receptors • Avoids significant impact from emergency vehicle sirens 	<ul style="list-style-type: none"> • Reduced construction noise impacts compared to the proposed project • No new on-site sensitive noise receptors • Avoids significant impact from emergency vehicle sirens
Aesthetics	<ul style="list-style-type: none"> • Altered visual character compared to existing conditions • Requires mitigation for new sources of substantial light 	<ul style="list-style-type: none"> • No change in aesthetic condition of site or views of the site from off-site vantage points 	<ul style="list-style-type: none"> • Altered visual character compared to existing conditions, but changes are reduced compared to the proposed project and the Reduced Project/No Hotel Alternative (Alternative 3) 	<ul style="list-style-type: none"> • Altered visual character compared to existing conditions, but changes are less than the proposed project because the proposed hotel would not be implemented in the southwest portion of the site • Requires mitigation for new sources of substantial light

Table 5.A: Alternatives Comparison Matrix

Issue Topic	Proposed Project	No Project/No Development (Alternative 1)	No Project/Existing Master Plan (Alternative 2)	Reduced Project/No Hotel (Alternative 3)
Biological Resources	<ul style="list-style-type: none"> • Potentially significant impacts to Belding’s Savannah sparrow, nesting native birds, Diegan coastal sage scrub, southern coastal salt marsh, native and nonnative vegetation communities, and associated wildlife species • Potentially significant impacts to riparian habitat, sensitive natural communities, federally protected wetlands, as well as to potential CDFG and CCC jurisdictional areas • Less than significant impacts to biological resources with mitigation • Includes restoration of the South Lot 	<ul style="list-style-type: none"> • No change from existing conditions 	<ul style="list-style-type: none"> • Alternative 2 requires less grading than the proposed project, resulting in reduced impacts to Belding’s Savannah sparrow, nesting native birds, native and nonnative vegetation, and associated wildlife species than the proposed project • No direct impacts to riparian habitat, sensitive natural communities, federally protected waters and wetlands, including CDFG and CCC jurisdictional area • Does not include restoration of the entire South Lot • No biological resource impacts to the proposed off-site fire station site 	<ul style="list-style-type: none"> • Reduced impacts to Diegan coastal sage scrub and southern coastal salt marsh compared to the proposed project • Reduced impacts to native and nonnative vegetation communities and associated wildlife species compared to the proposed project • Potentially significant impacts to riparian habitat, sensitive natural communities, federally protected wetlands, and potential CDFG and CCC jurisdictional areas • Less than significant impacts to biological resources with mitigation • Includes long-term restoration of the South Lot • No biological resource impacts to the proposed off-site fire station site
Cultural Resources	<ul style="list-style-type: none"> • No impact any known archaeological, historical, or paleontological resources on site • Possibility of discovering unknown archaeological or paleontological resources • Demolition of Bing Crosby Hall, Exhibit Hall, and the Don Diego Clock 	<ul style="list-style-type: none"> • No change from existing conditions 	<ul style="list-style-type: none"> • No impact to any known archaeological, historical, or paleontological resources on site • Possibility of discovering unknown archaeological or paleontological resources • Does not require demolition of the Bing Crosby Hall, Exhibit Hall, or Don Diego Clock Tower 	<ul style="list-style-type: none"> • No impact to any known archaeological, historical, or paleontological resources on site • Possibility of discovering unknown archaeological or paleontological resources • Demolition of the Bing Crosby Hall, Exhibit Hall, and the Don Diego Clock Tower, which are contributing features to a potential historic district

Table 5.A: Alternatives Comparison Matrix

Issue Topic	Proposed Project	No Project/No Development (Alternative 1)	No Project/Existing Master Plan (Alternative 2)	Reduced Project/No Hotel (Alternative 3)
	Tower <ul style="list-style-type: none"> • Less than significant impacts to cultural resources with mitigation 			
Geology and Soils	<ul style="list-style-type: none"> • Potential geologic hazards include impacts related to seismic ground shaking, liquefaction, landslides and slope stability, corrosive soil, ground settlement, and expansive soil • Less than significant impacts related to geology and soils after mitigation 	<ul style="list-style-type: none"> • No change from existing conditions 	<ul style="list-style-type: none"> • Same as proposed project 	<ul style="list-style-type: none"> • Same as proposed project
Hazards and Hazardous Materials	<ul style="list-style-type: none"> • Potential hazards related to the possible discovery of unknown waste or suspect materials, as well as LBP, ACM and PCBs during demolition, grading, excavation, or construction activities • Less than significant impacts related to hazards and hazardous materials with mitigation 	<ul style="list-style-type: none"> • No change from existing conditions 	<ul style="list-style-type: none"> • Same as proposed project 	<ul style="list-style-type: none"> • Same as proposed project
Population and Housing	<ul style="list-style-type: none"> • No potentially significant impacts related to housing and population 	<ul style="list-style-type: none"> • No effects on existing conditions 	<ul style="list-style-type: none"> • Same as proposed project 	<ul style="list-style-type: none"> • Same as proposed project
Hydrology and Water Quality	<ul style="list-style-type: none"> • Drainage system modifications • Slight alteration of 	<ul style="list-style-type: none"> • No change to existing hydrologic conditions • No water quality 	<ul style="list-style-type: none"> • Fewer drainage system modifications than the proposed project 	<ul style="list-style-type: none"> • Same as the proposed project but fewer BMPs

Table 5.A: Alternatives Comparison Matrix

Issue Topic	Proposed Project	No Project/No Development (Alternative 1)	No Project/Existing Master Plan (Alternative 2)	Reduced Project/No Hotel (Alternative 3)
	existing drainage patterns <ul style="list-style-type: none"> • Minor increases to on- and off-site flows • Minor change in water surface elevation within 100-year floodplain • Implementation of BMPs to meet NPDES standards for storm water runoff • Less than significant impacts related to hydrology and water quality after mitigation 	improvements	<ul style="list-style-type: none"> • Less alteration of existing drainage patterns than the proposed project • Minor increases to on- and off-site flows • Minor change in water surface elevation within 100-year floodplain • Implementation of fewer BMPs to meet NPDES standards for storm water runoff than the proposed project 	
Public Services and Utilities	<ul style="list-style-type: none"> • Impacts to water/wastewater services • Impacts to storm water services • Requires relocation of fire station 	<ul style="list-style-type: none"> • No additional public services or utilities required 	<ul style="list-style-type: none"> • Fewer impacts to water/wastewater services than the proposed project • Fewer impacts to storm water services than the proposed project • Does not require relocation of fire station 	<ul style="list-style-type: none"> • Slightly fewer impacts to water/wastewater services than the proposed project • Slightly fewer impacts to storm water services than the proposed project • Does not require relocation of fire station

Table 5.A: Alternatives Comparison Matrix

Issue Topic	Proposed Project	No Project/No Development (Alternative 1)	No Project/Existing Master Plan (Alternative 2)	Reduced Project/No Hotel (Alternative 3)
Recreation	<ul style="list-style-type: none"> • Would not cause an increase in use or physical deterioration of off-site recreational • Would not require construction or expansion of recreational facilities that might have an adverse physical effect on the environment • Adds new recreational facilities to the site 	<ul style="list-style-type: none"> • No change from existing conditions • No additional recreational facilities added 	<ul style="list-style-type: none"> • Fewer additional recreational facilities compared to the proposed project • The Fairground amenities would be available to off-site guests only • Would not cause an increase in use or physical deterioration of off-site recreational facilities • Would not require construction or expansion of recreational facilities which might have an adverse physical effect on the environment 	<ul style="list-style-type: none"> • The Fairground amenities would be available to off-site guests only • Would not cause an increase in use or physical deterioration of off-site recreational facilities • Would not require construction or expansion of recreational facilities that might have an adverse physical effect on the environment
Agricultural Resources	<ul style="list-style-type: none"> • No impact to agricultural resources 	<ul style="list-style-type: none"> • Same as proposed project 	<ul style="list-style-type: none"> • Same as proposed project 	<ul style="list-style-type: none"> • Same as proposed project
Mineral Resources	<ul style="list-style-type: none"> • No impact to mineral resources 	<ul style="list-style-type: none"> • Same as proposed project 	<ul style="list-style-type: none"> • Same as proposed project 	<ul style="list-style-type: none"> • Same as proposed project
Greenhouse Gases and Energy	<ul style="list-style-type: none"> • Results in GHG emissions 	<ul style="list-style-type: none"> • No change from existing conditions 	<ul style="list-style-type: none"> • Results in GHG emissions, but substantially less than proposed project 	<ul style="list-style-type: none"> • Results in GHG emissions, but less than proposed project
Summary Comparison of Impacts Relative to the Proposed Project	<ul style="list-style-type: none"> • Not applicable 	<ul style="list-style-type: none"> • No new environmental impacts • Does not meet project objectives 	<ul style="list-style-type: none"> • Does not meet all the project objectives • The significant project impacts related to construction air quality would not be avoided under this alternative • This alternative would result in reduced impacts for traffic, operational air quality, noise, and biological resources compared with the proposed project • Results in GHG emissions but substantially less than the proposed project 	<ul style="list-style-type: none"> • Does not meet all the project objectives • The significant project impacts related to construction and operational air quality would not be avoided under this alternative • This alternative would result in reduced impacts for traffic and noise, compared with the proposed project • Results in GHG emissions, but substantially less than proposed project

Table 5.B: Summary of Alternatives/Significant Impacts

Topic	Significant Effect/Project	No Project/No Development Alternative (Alternative 1)	No Project/Existing Master Plan Alternative (Alternative 2)	Reduced Project /No Hotel Alternative (Alternative 3)
Traffic	<ul style="list-style-type: none"> Mitigation measures are completely within the control of other jurisdictional agencies; implementation cannot be ensured by the 22nd DAA. Therefore, all potentially significant traffic impacts are presumed to remain significant for purposes of CEQA conclusions, including impacts to 11 intersections and 2 street segments, and 1 ramp meter 	<ul style="list-style-type: none"> No change from existing conditions 	<ul style="list-style-type: none"> Significant unavoidable impacts to 8 intersections 	<ul style="list-style-type: none"> Significant unavoidable impacts to 11 intersections
Air Quality Project-level and cumulative construction-related impacts	<ul style="list-style-type: none"> The project emissions result in significant, unavoidable impacts: construction emissions of ROG, operational emissions of PM₁₀, conflict with or obstruct implementation of the San Diego Air Basin 2004 Triennial Regional Air Quality Strategy (RAQS) Revision, and cumulative impact to air quality for ROG and PM₁₀ as a result of contribution to serious non-attainment status for 1-hour O₃ and PM₁₀ 	<ul style="list-style-type: none"> No change from existing conditions 	<ul style="list-style-type: none"> Construction air quality emissions would be less than the proposed project impacts, and less than significant with construction phasing and use of low VOC materials Operational PM₁₀ emissions would be less than significant No conflict with RAQS Cumulative contribution to serious nonattainment status for 1-hour O₃ and PM₁₀ would be less than significant 	<ul style="list-style-type: none"> Construction air quality effects would be less than the proposed project, but still significant and unavoidable Operational PM₁₀ emissions would be significant and unavoidable Conflict with RAQS/ significant impact Cumulative contribution to serious nonattainment status for 1-hour O₃ and PM₁₀ would be significant and unavoidable

Table 5.B: Summary of Alternatives/Significant Impacts

Topic	Significant Effect/Project	No Project/No Development Alternative (Alternative 1)	No Project/Existing Master Plan Alternative (Alternative 2)	Reduced Project /No Hotel Alternative (Alternative 3)
Noise	<ul style="list-style-type: none"> The proposed relocation of the fire station may result in a significant operational noise impact from emergency vehicle sirens 	<ul style="list-style-type: none"> No change from existing condition 	<ul style="list-style-type: none"> Fire station would not be relocated and siren noise impact would be avoided 	<ul style="list-style-type: none"> Fire station would not be relocated and siren noise impact would be avoided
Public Services and Utilities	<ul style="list-style-type: none"> If no additional in-County physical landfill capacity is added, the County may exhaust physical waste disposal capacity in approximately 2016. The project's incremental contribution to cumulative waste disposal shortfalls could be significant and adverse 	<ul style="list-style-type: none"> No change from existing conditions 	<ul style="list-style-type: none"> Improvements do not involve the creation of substantial new uses on site; the increase in solid waste is expected to be very small and would not result in a significant cumulative impact to County landfill capacity 	<ul style="list-style-type: none"> Improvements would allow for new land uses on site; therefore, the increase in solid waste is expected to be greater than existing conditions and would result in a significant cumulative impact to County landfill capacity
Greenhouse Gases	<ul style="list-style-type: none"> Total GHG emissions of the proposed project would exceed current levels generated at the project site and are considered to be cumulatively considerable 	<ul style="list-style-type: none"> No change from existing conditions 	<ul style="list-style-type: none"> Total GHG emissions of the proposed project would exceed current levels generated at the project site and would be considered to be cumulatively considerable 	<ul style="list-style-type: none"> Total GHG emissions of the proposed project would exceed current levels generated at the project site and would be considered to be cumulatively considerable