

## 8.0 SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

### INTRODUCTION

Section 15126.2(B) of the State California Environmental Quality Act (CEQA) Guidelines requires that an Environmental Impact Report (EIR) describe significant environmental impacts that cannot be avoided, including those effects that can be mitigated but not reduced to a less than significant level. The following is a summary of the impacts that were considered significant and unavoidable. These impacts are also described in detail in Chapter 4.0, Existing Environmental Setting, Environmental Analysis, and Impacts and Mitigation Measures.

### INVENTORY OF SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

#### Traffic

The significant traffic impacts of the proposed project are to the following intersections, roadway segments, and one California Department of Transportation (Caltrans) meter location:

- Intersections:
  - 1. Lomas Santa Fe Drive/Highway 101
  - 3. Via de la Valle/Camino Del Mar (this impact occurs under long-term conditions only)
  - 4. Via de la Valle/Solana Gate
  - 5. Via de la Valle/Jimmy Durante Boulevard
  - 6. Via de la Valle/Interstate 5 (I-5) southbound (SB) ramps
  - 7. Via de la Valle/I-5 northbound (NB) ramps
  - 9. Via de la Valle/El Camino Real West
  - 11. Jimmy Durante Boulevard/Main Gate
  - 12. Jimmy Durante Boulevard/Office Gate/Fire Exit
  - 13. Jimmy Durante Boulevard/San Dieguito Drive
  - 15. Camino Del Mar/13th Street
  - 16. Camino Del Mar/11th Street
  - 18. Camino Del Mar/Del Mar Heights Road
- Street Segments:
  - **Camino Del Mar.** Jimmy Durante Boulevard to 15th Street
  - **Camino Del Mar.** 15th Street to 11th Street

- **Via de la Valle.** Jimmy Durante Boulevard to I-5 southbound (SB) ramps
- Ramp Meters:
  - Via de la Valle eastbound (EB) to I-5 SB ramp

The 22nd District Agricultural Association (DAA) is the owner and operator of the Fairgrounds property, and does not have jurisdiction over local roadways or State highways. The implementation of the improvements identified in Mitigation Measures requires planning, funding, and implementation actions by the affected local jurisdiction and Caltrans. The 22nd DAA does not have the authority to implement improvements to the affected public roadways; however, the 22nd DAA may contribute a proportionate dollar amount to improve transportation facilities that is based on an analysis of the project's (not the site's) proportionate contribution to the related impact.

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.

## Air Quality

The following emissions result in significant, unavoidable impacts: construction emissions of reactive organic gas (ROG), operational emissions of particulate matter less than 10 microns in diameter ( $PM_{10}$ ), conflicting with or obstructing implementation of the San Diego Air Basin (Basin) 2004 Triennial Regional Air Quality Strategy (RAQS) Revision, and cumulative impact to air quality for ROG and  $PM_{10}$  as a result of contribution to serious nonattainment status for 1-hour ozone ( $O_3$ ) and  $PM_{10}$ .

Air quality impacts would occur during construction of the proposed project from demolition, grading and excavating, and equipment exhaust. While implementation of the proposed project is not anticipated to exceed the daily construction thresholds for most criteria pollutants, exceedance of the ROG emissions would occur as a result of paving and the application of paint and other architectural coatings. ROG (also known as volatile organic compound [VOC]) is a precursor to  $O_3$ .

Long-term regional air emission impacts are those associated with stationary sources and mobile sources as a result of implementation of the proposed Master Plan projects. Stationary source emissions are relatively low, particularly with the implementation of LEED-NC Silver certified construction standards for new buildings. Mobile source emissions from the vehicular traffic associated with the project exceed the operational  $PM_{10}$  thresholds.

Implementation of the proposed near-term projects will result in exceedances of the ROG construction thresholds and the  $PM_{10}$  operational thresholds. These impacts are significant project-level impacts. The Basin is in nonattainment for 1-hour  $O_3$  and  $PM_{10}$  (as well as  $PM_{2.5}$ ). Therefore, the project's incremental contribution of these pollutants is considered to be cumulatively considerable. The proposed project results in a significant unavoidable cumulative impact to air quality for  $O_3$  and  $PM_{10}$ .

The proposed near-term and long-term projects are not reflected in current plans available to the San Diego Association of Governments (SANDAG) and San Diego Air Pollution Control District (SDAPCD), and therefore, the proposed Master Plan projects are considered to be inconsistent with the SANDAG forecast and the Master Plan is therefore inconsistent with the RAQS. Mitigation described above calls for the 22nd DAA to submit the updated Master Plan to SANDAG and SDAPCD upon its adoption. It is anticipated that the regional agencies will incorporate the updated Master Plan when next updating the model runs for regional air quality. The decision if and when to incorporate the updated Master Plan in regional air quality modeling is not within the control of the 22nd DAA; therefore, this impact remains significant and unavoidable after mitigation.

### **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.

### **Public Services and Utilities**

The geographic area for the cumulative analysis for landfills is defined as the County of San Diego (County). Implementation of the Sustainability Component of the Master Plan (Section 3.5.3 of this EIR), including commitments to the 22nd DAA's "zero waste" waste reduction program and landscaping that minimizes the production of plant material waste, would reduce operational-related impacts to landfill capacity. Mitigation Measure 4.16.13, requiring preparation of a Building Materials Recycling Plan to evaluate the feasibility of reusing demolished materials on site, would further reduce construction-related effects to landfill capacity. However, if no additional in-county physical landfill capacity is added, the County may exhaust physical waste disposal capacity in approximately 2016.<sup>1</sup> At this time expansion plans at the Sycamore Sanitary Landfill and construction of the Gregory Canyon Landfill are uncertain. Until such time that additional long-term capacity becomes available, the County is facing a possible waste disposal capacity shortfall. The County could possibly account for physical capacity shortfalls within the County by exporting waste; however, the continued availability of out-of-county disposal sites is not known, and other disposal sites may or may not become available in the future.<sup>2</sup> After implementation of the Sustainability Commitments of the Master Plan, the proposed project is anticipated to generate approximately 55 tons per year (tpy) of waste, which is less than 0.01 percent of the total estimated waste disposal

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

<sup>2</sup> Ibid.

demand in the County in 2017. Although this would not be a significant project impact, the proposed project's incremental contribution to cumulative waste disposal capacity shortfalls could be significant and adverse.

### **Greenhouse Gases (GHG)**

Project component project design feature (PDF) GHG-1 requires that the proposed structures be built in accordance with the 2008 Fairgrounds Master Plan and achieve LEED-NC Silver certification. The near-term projects will implement mitigation measures to further reduce energy consumption and to foster transit use. The 22nd DAA will monitor the development of implementation requirements of Assembly Bill (AB) 32, to be issued by State agencies, and any subsequently adopted GHG emissions reduction procedures and technologies relevant to the proposed project.

The proposed project is consistent with and/or furthers the intent of numerous GHG reduction strategies and is consistent with the Cities and County General Plan goals and Climate Action Protection Program strategies, which are designed to reduce energy consumption and GHG emissions that are being implemented pursuant to AB 32. These strategies are presented in Tables 4.16.G and 4.16.H. Compliance with the reduction strategies implemented by the Cities and the County will help to achieve the Statewide reduction of GHG to 1990 levels.

The proposed near-term projects 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 above cannot fully offset the emissions resulting from implementation of the Master Plan. Therefore, the total emissions for the proposed project exceed current levels and are considered to be cumulatively considerable.