

February 8, 2010

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Subject: Comments of the San Dieguito River Valley Conservancy to the Board of Directors of the 22nd District Agricultural Association Regarding the Draft Environmental Impact Report for the Draft 2008 Del Mar Fairgrounds Master Plan

Dear Mr. Fuller and Members of the 22nd DAA Board of Directors:

Enclosed are the comments of the San Dieguito River Valley Conservancy (SDRVC) concerning the Draft Environmental Impact Report (DEIR) for the DRAFT 2008 Del Mar Fairgrounds Master Plan.

SDRVC is a 24 year-old, non-profit citizen resource conservancy, whose mission is to assist in protecting the natural, recreational, educational and culturally historic resources of the San Dieguito Watershed, extending from Volcan Mountain, the headwaters for the river system, to the Pacific Ocean and San Dieguito Lagoon, where the Del Mar Fairgrounds are located.

The Conservancy has an ongoing history of productive relationships working with Del Mar Fairgrounds staff. We feel that an upgraded and financially viable Fairgrounds facility and operation is an important element of a protected natural river corridor system and potential complement to the River Park. However, after careful review, we have concluded the proposed “master plan” for the Fairgrounds, presented in the DEIR, needs to be substantially revised and improved. Our conclusion is that the DRAFT Master Plan is not consistent with the concepts of the River Park Plan that address the “focused planning area” of the River Park, within which the Fairgrounds is located, and significantly – and negatively – affect the resource values of the largely open river corridor.

Furthermore, SDRVC finds that the DEIR is not technically sound:

- That the DEIR does not adequately describe the master plan “project” and its component elements;
- That the DEIR fails to identify – and evaluate - significant impacts to the environment, particularly with respect to: wetlands; biological resources along the river channel; the full extent of traffic impacts to the community, including growing public use of the River Park; and, maybe most importantly, the proposed development intensification
- That the proposed plan constitutes a fundamental change in the character of the Fairgrounds, which negatively affects the River Park and is not consistent with the California Coastal Act;
- That the impacts that have been identified – and the ones that have not been identified or have not been adequately evaluated – have not been adequately mitigated; and
- That there are feasible alternatives to the proposed “master plan” that will meet the purpose and goals of the Fairgrounds and avoid significant negative impacts, particularly with respect to the River Park, the open space values, and the natural resources of the river corridor.

We are particularly concerned with the proposed development of a large condo-hotel immediately adjacent to the river. The hotel project is not only environmentally destructive, it is highly speculative from an economic standpoint and is NOT – according to the analysis done for the DRAFT 2000 Fairgrounds Master Plan - essential to the support of Fairgrounds events and activities. This new 24-hour, 365-days-a-year commercialization of the Fairgrounds, immediately adjacent to the river corridor and in proximity to the \$86 million electricity ratepayer-financed San Dieguito Lagoon Restoration Project, is especially problematic and inconsistent with the River Park plan and operations. The proposal would result in a basic “change of character” for the river corridor - from a generally open-feeling, with agricultural-style buildings, to a wall-like urban-style convention center.

The DEIR establishes the “no-hotel alternative” as a feasible option. SDRVC’s comments include an example of the type of upgraded exhibit and conference facility that could complement and gain advantage for the Fairgrounds of the riverside setting. However, to be compatible with the River Park and mitigate community impacts, elements in addition to the hotel would need to be reconsidered.

Our greatest concern is the lost opportunity for the Fairgrounds and the River Park to reinforce each other’s mission and values. The proposal being made flies in the face of the sentiments expressed by a broad cross section of the community in the area of the project.

In spite of our concerns with what has been proposed for the Fairgrounds, we feel a realistic potential exists for interests in the community to work together to formulate an alternative that can satisfy the basic needs of the Fairgrounds and the legitimate concerns of the community. In this respect, we have tried in our comments to identify alternatives toward this reconciliation.

Our hope is that the 22nd District Agricultural Association, the “decision maker” with respect to the “master plan”, will take the comments it receives on the DEIR seriously and consider additional dialogue with the community to develop a revised, updated master plan.

A realistic appraisal of future approvals that will be needed to implement a Fairgrounds Master Plan, such as from the California Coastal Commission, underline the advantages to considering major revisions, more compatible with the coastal and river corridor systems that characterize the area.

The San Dieguito River Valley Conservancy stands ready to further explain the ideas for refinements for the master plan we have suggested and to work with the Fairgrounds and other interests in the community to explore the range of concerns and ideas in response to the DEIR – but firm in our concerns regarding the present proposals.

Respectfully,

Bill Proffer, President
San Dieguito River Valley Conservancy