

February 5, 2010

Dustin Fuller, Sr. Environmental Planner
22nd District Agricultural Association
Del Mar Fairgrounds
2260 Jimmy Durante Boulevard
Del Mar, CA 92014-2216

SUBJECT: Comments on Del Mar Fairgrounds Master Plan Draft Environmental Impact Report

Dear Mr. Fuller,

We are San Diego residents who frequently drive round-trip to Huntington Beach, marveling at the scenic beauty provided by the coastal lagoons and river valleys along the way. The views across the recently restored San Dieguito Lagoon toward the Pacific Ocean are particularly special to us because we have been involved with this preservation effort, and because the effort confirms that communities and residents can work together successfully to protect our natural, scenic resources for future generations.

Therefore we are disappointed that the DEIR not only fails to describe the unique character of this scenic vista but also provides inappropriate and therefore false representations of the views from both northbound I-5 and southbound I-5 toward the proposed project. Our concern is that the DEIR is deficient as follows:

SECTION 4.5 AESTHETICS

On page 4.5-1 under Existing Environmental Setting, the DEIR inexplicably excludes the San Dieguito River Valley from its definition of Existing Visual Resources. This is an egregious omission since the River Valley with views toward the Pacific Ocean is the key open space vista in this area and one of the last remaining in San Diego County. The second paragraph goes on to state “Land uses surrounding the project site are primarily commercial and/or residential ...etc.” In fact, the project site is surrounded to the west, the south and partially on the east by the newly restored San Dieguito Lagoon and bordered on all sides by trails provided for walkers, hikers and cyclists and a scenic drive designated for the specific purpose of allowing car passengers to enjoy the unique scenic qualities of the Lagoon and River Valley environment. The importance of preserving the visual resources of this restored natural resource is clearly outlined in the San Dieguito River Park Concept Plan, approved by the City of San Diego in 1994, page 40 under *Special Design Considerations for the Del Mar Coastal Lagoon Landscape Unit*:

“Due to the special characteristics within the Del Mar Coastal Lagoon landscape unit, ... the following site specific design recommendations should be considered when reviewing public and private development proposals within this portion of the (River Park’s Focused Planning Area) FPA:

- *The sweeping open space views within this landscape should be protected.*
- *Future development should be compatible with the open space character of the lagoon area in term of both visual compatibility and intensity of use.*
- *View opportunities of the lagoon and ocean from trails and existing circulation routes should be preserved and, where appropriate, enhanced.”*

SECTION 4.5.3 REGULATORY SETTING

In order to be complete, information about the San Dieguito River Valley must be included in the aforementioned Section 4.5.2 Existing Environmental Setting, and the San Dieguito River Park Concept Plan must be included under Section 4.5.3 Regulatory Setting, beginning on page 4.5-15. These inclusions would certainly impact the conclusions reached in Section 4.5.6 (page 4.5-23) Project Impacts and the Threshold of Significance 4.5.1 on page 1-33: Have a substantial adverse effect on a scenic vista and Threshold 4.5.2 on page 4.5-27 Substantially damage scenic resources within.... state scenic highway.

WITHOUT THESE INCLUSIONS, THE DEIR IS INCOMPLETE AND IT'S CONCLUSION THAT "THERE ARE NO AESTHETIC OR VISUAL RESOURCES LOCATED ON SITE OR IN THE SURROUNDING VICINITY THAT HAVE BEEN DESIGNATED AS SCENIC VISTAS IN CITY OR COUNTY POLICIES OR PLANS" AND THAT THE IMPACT OF THE PROJECT IS LESS THAN SIGNIFICANT IS UNTRUE.

Existing Viewsheds Descriptions: Figure 4.5.4 (DEIR Views 5 and 6)

At 4.5-2, the DEIR states "views were selected to show the view of traffic toward the project site from the adjacent public roads.... (and) photographs were taken to analyze the various views and land uses that would potentially be affected by the proposed project."

If these photographs were used to analyze the impact of the proposed project on scenic views, the DEIR is clearly deficient since the views selected were not taken from I-5 toward existing views of the Pacific Ocean and the project site. Inexplicably, photographs are taken from the on-ramp at Via de la Valle (View 5 description) and of trees and tent structures on the Surf and Turf lot (View 6 description). Neither could possibly be considered as views from I-5 looking at the impact of the proposed project on existing coastal vistas.

Please find attached, photos taken by Stuart Smith from both the northbound and southbound lanes on I-5 clearly showing the unique views of the San Dieguito Lagoon and Pacific Ocean to the west toward the project site. The photos by Mr. Smith are positioned above the photos provided in the DEIR that claim to show that the project would not "substantially degrade the existing visual character or quality of the site and its surroundings." In fact, the DEIR View 5 and View 6 photos misrepresent completely the existing visual character of the site and its surroundings and the conclusions drawn are untrue.

Further, at 4.5-25 (Threshold 4.5.1 Have a substantial adverse effect on a scenic vista), third paragraph, the DEIR states that although views "will be punctuated by the Master Plan projects...(the) views from I-5 are fleeting as a result of the vehicle speeds and, while public, views from I-5 are not considered to be view of a scenic vista." This is an untrue statement. The views are of such a marvelous scenic quality that they hold our attention for significant periods of time as we travel round-trip from San Diego to Huntington Beach and obviously provide travelers with unparalleled views of a scenic vista.

Figure 4.5.3 (DEIR View 4)

Finally, View 4 on page 4.5-11 of the DEIR suggests that there is no view of the Pacific Ocean from Jimmy Durante Boulevard facing west. However the view that is seen by hundreds of visitors to the many events at the Fairgrounds, notably the County Fair, is the view of the River, the horizon and the North Bluffs Preserve from the Jimmy Durante Boulevard BRIDGE looking west. Using a view from further north on Jimmy Durante Boulevard is a grievous omission by the DEIR and ignores the purpose of the document, which is to identify environmental impacts and suggest alternatives

that would reduce the impact. Again we have included a photo taken by Mr. Smith that shows a public view from the bridge on Jimmy Durante Boulevard looking west over the River toward the Ocean and the North Bluffs Preserve that would be impacted by the proposed Fairgrounds project. Again the photo provided in the DEIR (View 4) is a misrepresentation of the existing visual character of the site and its surroundings and its conclusion regarding the impact of the proposed project is false.

Finally please find attached a modified DEIR Figure 4.5.1 to show the locations from which Stuart Smith's photos were taken: B (View West from Jimmy Durante Blvd. at the Bridge), N (View from the Northbound I-5 Lane) and S (View from the Southbound I-5 Lane) compared to the DEIR "View Vantage Location(s 4,5 and 6)" that we have discussed.

We ask that the DEIR be revised to include a description of the San Dieguito River Valley as an Existing Visual Resource in Section 4.5, and that the San Dieguito River Valley Concept Plan be included as a Regulatory Agency in Section 4.5.3. We are also asking that the DEIR provide photos of the views from northbound and southbound I-5, and from Jimmy Durante Blvd at the Jimmy Durante Bridge toward the Pacific Ocean that are, as suggested by the photos taken by Mr. Smith, more relevant to the Environmental Review process for determining significant impacts on scenic vistas, scenic resources and the existing visual character of the site and its surroundings. Finally additional photo simulations must be prepared using the corrected views to help reviewers "better understand and communicate the potential visual changes associated with the proposed Master Plan projects," and "to provide a good representation of the overall project character as visible from a variety of land use areas." (Quotes are from the DEIR description of Photo Simulations on page 4.5-22.)

We appreciate the opportunity to comment on the 22nd District Agricultural Association's proposed project, and hope you will respond to the concerns by revising the sections, photos and simulations we have brought to your attention.

Sincerely,

Ben Nyce and Ann Gardner
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Photos by:
Stuart Smith
615 Rimini Road
Del Mar CA 92014



FIGURE 4.5.1

LSA



0 300 600
FEET

SOURCE: RNL



-View Vantage Location

(B) (N) & (S) - Locations of our photos

Del Mar Fairgrounds Master Plan EIR
Photograph Location Key Map



View West from Jimmy Durante Blvd.



DEIR View 4



View of Lagoon and Fairgrounds from I-5 - South bound lane



DEIR View 5



View of Lagoon and Fairgrounds from I-5 - North bound Lane



DEIR View 6