

RACETRACK ENGINEERED SURFACE PROJECT  
INITIAL STUDY AND MITIGATED  
NEGATIVE DECLARATION

A Project Report  
presented to  
the Faculty of California Polytechnic State University,  
San Luis Obispo

In Partial Fulfillment  
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Master of City and Regional Planning

by  
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RACETRACK ENGINEERED SURFACE PROJECT IS/MND

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Negative Declaration

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ABSTRACT

Racetrack Engineered Surface Project  
Initial Study and Mitigated Negative Declaration

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The Professional Project addressed here is an Initial Study/Mitigated Negative Declaration for a project proposed by the staff of the Del Mar Fairgrounds pursuant to legal mandate by the State of California Horse Racing Board.

The "Project" subject to documentation under CEQA consisted of removal of the top seven inches of the existing dirt surface on the Del Mar Fairgrounds horse racing track and temporary storage of the material on the practice track infield; installation of a new drainage system, rock filtration system, permeable asphalt layers, and seven inches of engineered surface material; widening of the track in the northeast and southeast curve area; and removal and replacement of existing retaining wall, fence, and landscaping improvements.

This Project Report summarizes the stakeholder involvement concepts utilized to obtain project support and approval in an environmentally sensitive area, subject to a long history of political contention, in the midst of other long-term planning efforts such as the San Dieguito Lagoon Restoration Project, and an Updated Master Plan and Master Plan Environmental Impact Report for the fairgrounds property.

Ultimately, the Project and CEQA documentation were approved by the Lead agency's decision-making body, the Board of Directors of the State of California's 22<sup>nd</sup> District Agricultural Association.

Keywords: California Coastal Act, California Environmental Quality Act, Initial Study, Mitigated Negative Declaration, Community Outreach, Stakeholder Involvement

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## 1.0 Introduction

This Project Report describes the process under which the decision was made to prepare documentation under the California Environmental Quality Act (CEQA), as well as the appropriate type of documentation, for the proposed Racetrack Engineered Surface Project. The racetrack is located at the Del Mar Fairgrounds in north-western San Diego County. The fairgrounds are owned and operated by the 22<sup>nd</sup> District Agricultural Association (22<sup>nd</sup> DAA; Del Mar Fairgrounds) of the State of California (State), and the horse racing and associated facilities, including the racetrack, are operated by the Del Mar Thoroughbred Club (DMTC) under an operating agreement with the 22<sup>nd</sup> DAA.

The “Project” subject to documentation under CEQA consisted of removal of the top seven inches of the existing dirt surface on the Del Mar Fairgrounds horse racing track and temporary storage of the material on the practice track infield; and installation of a new drainage system, a rock filtration system, permeable asphalt layers, and seven inches of a manmade engineered surface material. The engineered surface materials consists of 80-90 percent silica sand, recycled carpet fiber, and a recycled rubberized product, all coated with micro-coated wax. The Project also included widening the racetrack in the northeastern and southeastern curve areas to accommodate changes in grade, and removal and replacement of an existing retaining wall, fence, and some landscaping improvements in the northeastern curve area. The primary issues raised by the Project relate to potential adverse impacts on water quality, potential channelization of the floodplain, and the potential for an increase in the intensity of use of the site.

The Final Initial Study/Mitigated Negative Declaration (IS/MND) was approved by the 22<sup>nd</sup> DAA Board of Directors in November 2006, with the Coastal Development Permit (CDP) approval granted by the California Coastal Commission (CCC) in March 2007. The Final IS/MND was submitted to the City and Regional Planning Department (CRP Department) under separate cover, as a “Professional Project” meeting the CRP Department and California Polytechnic State University (CalPoly) *Guidelines for Completing Graduate Theses and Reports* (CalPoly, 2002).

## **2.0 Purpose and Need for Project**

The DMTC operates at the Fairgrounds property under an operating agreement to the 22<sup>nd</sup> DAA, in which American Thoroughbred horse races are held each summer, in addition to numerous training activities throughout the year.

As noted above, conversion of all existing dirt equestrian tracks in the State to engineered surfaces was mandated by the California Horse Racing Board, who required that they be completed by December 31, 2007 (PMC, 2006). The anticipated benefits of the engineered surface were three fold: (1) to lessen injury to horse and rider; (2) it is made with recycled carpet fiber and ground tires; and (3) to reduce the use of water during the races by approximately 4.5 million gallons (annually?). Given the regulatory requirement to replace the racetrack surface, the DMTC and 22<sup>nd</sup> DAA identified the following objectives for implementation of the Proposed Project:

- To implement a new racing surface on the existing racetrack that is much safer for horses and equestrians;
- To reduce the quantity of water and maintenance needed to keep the right level of compaction of the racing surface during races. Engineered Surface requires less than ten (10) percent of the maintenance watering required under the existing condition; and
- To reduce the amount of dust currently generated on the track during maintenance, training and racing activities through the use of the new Engineered Surface material, a wax-coated substance that is resistant to dust.

## **2.1 CEQA Framework**

CEQA, Public Resources Code Section 21000 et seq. (State, 1970a, as amended), and the State CEQA Guidelines, Title 14 California Code of Regulations (CCR) Section 15000 et seq. (State, 1970b, as amended) require discretionary actions in which an environmental impact may occur to provide documentation of such environmental impacts for consideration by decision-makers with approval power over the action. The decision-makers with primary approval authority over an action are known as the “Lead agency” under CEQA. Pursuant to State CEQA Guidelines Section 15367, “a ‘Lead agency’



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means the public agency which has the principal responsibility for carrying out or approving a project. The lead agency will decide whether an EIR or negative declaration will be required for the project and will cause the document to be prepared.” Other agencies with permitting authority or roles in the preservation of natural resources are classified as Trustee or Responsible agencies.

"Responsible agency" means a public agency which proposes to carry out or approve a project, for which a lead agency is preparing or has prepared an EIR or negative declaration. For the purposes of CEQA, the term "responsible agency" includes all public agencies other than the lead agency which have discretionary approval power over the project (State CEQA Guidelines Section 15381).

"Trustee agency" means “a state agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State of California project. Trustee agencies include:

- (a) The California Department of Fish and Game with regard to the fish and wildlife of the State, to designated rare or endangered native plants, and to game refuges, ecological reserves, and other areas administered by the department.
- (b) The State Lands Commission with regard to state owned "sovereign" lands such as the beds of navigable waters and State school lands.
- (c) The State Department of Parks and Recreation with regard to units of the State Park System.
- (d) The University of California with regard to sites within the Natural Land and Water Reserves System” (State CEQA Guidelines Section 15386).

In the case of the Engineered Resurfacing of the Del Mar Fairgrounds Racetrack, the Lead Agency was the 22<sup>nd</sup> DAA. The City of Del Mar, with whom the 22<sup>nd</sup> DAA has a wastewater service agreement, was a Responsible Agency due to the need to discharge stormwater runoff into the City's sanitary sewer system. The CCC, who has permitting (CDP) authority under the CCA was also a Responsible Agency, although could also have been considered a Trustee agency due to their mission to protect the coastal resources of the State.

In order to be subject to evaluation and documentation under CEQA, an action or proposed development must meet the definition of a “project” under CEQA, as defined under Section 15378 of the State CEQA Guidelines:

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- (a) *"Project" means the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and that is any of the following:*
- (1) *An activity directly undertaken by any public agency including but not limited to public works construction and related activities clearing or grading of land, improvements to existing public structures, enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements thereof pursuant to Government Code Sections 65100-65700.*
  - (2) *An activity undertaken by a person which is supported in whole or in part through public agency contracts, grants, subsidies, loans, or other forms of assistance from one or more public agencies.*
  - (3) *An activity involving the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies.*
- (b) *Project does not include:*
- (1) *Proposals for legislation to be enacted by the State Legislature;*
  - (2) *Continuing administrative or maintenance activities, such as purchases for supplies, personnel-related actions, general policy and procedure making (except as they are applied to specific instances covered above);*
  - (3) *The submittal of proposals to a vote of the people of the state or of a particular community that does not involve a public agency sponsored initiative;*
  - (4) *The creation of government funding mechanisms or other government fiscal activities, which do not involve any commitment to any specific project which may result in a potentially significant physical impact on the environment.*
  - (5) *Organizational or administrative activities of governments that will not result in direct or indirect physical changes in the environment.*
- (c) *The term "project" refers to the activity which is being approved and which may be subject to several discretionary approvals by governmental agencies. The term "project" does not mean each separate governmental approval.*
- (d) *Where the lead agency could describe the project as either the adoption of a particular regulation under subdivision (a)(1) or as a development proposal which will be subject to several governmental approvals under subdivisions (a)(2) or (a)(3), the lead agency shall describe the project as the development proposal for the purpose of environmental analysis. This approach will implement the lead agency principle as described in Article 4.*

The proposed engineered surface was evaluated by the 22<sup>nd</sup> DAA to determine whether it met the definition of a "Project" under CEQA by reviewing the actions to be undertaken as a part of the construction, implementation, and operation of the new facility. The 22<sup>nd</sup> DAA, as Lead Agency, determined the proposed Racetrack Engineered Surface Project (hereinafter "Project" or "Proposed Project") did meet the definition of a "Project" under CEQA for the following reasons:

- 1) The proposal had potential to result in a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment;
- 2) The proposal included activity directly undertaken by any public agency including improvements to existing public structures;
- 3) The proposal was supported in whole through public agency subsidies;
- 4) The proposal involved the issuance of a permit and other entitlement for use by one or more public agencies; and
- 5) The proposal was subject to discretionary approvals by governmental agencies.

## **2.2 Selecting the Appropriate CEQA Document Type**

An IS is a public document to be used by the CEQA Lead Agency to determine whether the project may have a significant effect on the environment pursuant to CEQA. If the lead agency finds substantial evidence that any aspect of the project, either individually or cumulatively, may have a significant effect on the environment that cannot be mitigated, regardless of whether the overall effect of the project is adverse or beneficial, the lead agency is required to prepare an Environmental Impact Report (EIR), use a previously prepared EIR and supplement that EIR, or prepare a subsequent EIR to analyze the project at hand. If the agency finds no substantial evidence that a proposed project or any of its aspects may cause a significant impact on the environment with mitigation, a Negative Declaration (ND) shall be prepared with a written statement describing the reasons why the project would not have a significant effect on the environment, and therefore, why it does not require the preparation of an EIR (State CEQA Guidelines Section 15371).

In the case of the proposed project, a Draft IS was prepared in accordance with Appendix G of the State CEQA Guidelines to identify potential environmental resources to which an environmental impact could occur. The IS identified potential impacts to paleontological resources, hazardous material storage/transport, water quality compliance, construction-phase emergency access, construction-phase traffic, construction-phase roadway hazards, and wastewater facilities in the operational-phase (PMC, 2006).

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According to State CEQA Guidelines Section 15070, a ND shall be prepared for a project subject to CEQA when either:

- a) The IS shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or
- b) The IS identifies potentially significant effects, but:
  - (1) Revisions in the project plans or proposals made by or agreed to by the applicant before a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and
  - (2) There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.

As the CEQA Preparer, my role at this juncture was to provide professional recommendations as to the type of CEQA documentation most appropriate for the Project, based primarily on whether it was anticipated that potential impacts identified in the IS could be reduced or avoided to a level of less than significant through the implementation of mitigation measures, and if so, if the likely measures were agreeable to the 22<sup>nd</sup> DAA as the applicant.

Prior to preparation of the IS, several technical studies had been prepared to identify potential impacts, serve as documentation of such impacts, and provide professional recommendations on how such impacts could be avoided or reduced to a level of less than significant (see Section 3.2, below). Based on the studies prepared and analysis contained in the Draft IS, recommended mitigation measures were anticipated to reduce all potentially significant impacts below a level of significant, and were deemed acceptable to the 22<sup>nd</sup> DAA. Therefore, a determination was made that the appropriate documentation under CEQA would be a MND.

### 3.0 Project Conflicts and Resolution

Having worked on numerous projects for the 22<sup>nd</sup> DAA in an on-call environmental planning staff capacity, I personally observed how the fairgrounds property and associated activities have long been the subject of public concern and disagreement, due in large part, but not limited to, the following factors:

- The fairgrounds is built on primarily fill soils covering part of the historical boundary of the San Dieguito Lagoon, an area proposed for creation of a natural open space park in the San Dieguito River Valley (SDRP, 2011).
- Contention exists between regulatory agencies with different definitions and mapping of “wetlands,” and over which portions of the fairgrounds property may or may not be considered jurisdictional and/or protected under the California Coastal Act (CCA) or Federal Clean Water Act (CWA).
- The San Dieguito Lagoon restoration project includes restoring 150 acres of coastal wetland as off-site mitigation for cooling water system impacts to marine fish populations anticipated to occur as a result of Southern California Edison’s (SCE) San Onofre Nuclear Generating Station (SONGS) Units 2&3. The CCC’s 1997 revised CDP for SONGS Units 2&3 includes the wetlands restoration requirement (SCE, 2011). The lagoon restoration construction is now complete (subject to ongoing maintenance/monitoring activities). However, at the time of the racetrack engineered surface project, no work had yet begun, and coordination and negotiation to meet permit conditions continued between various resource agencies, SCE, and interest groups.
- The fairgrounds is located directly adjacent to the City of Del Mar to the south, City of Solana Beach to the north, and City of San Diego to the east. Fair, horse racing, and other year-round activities at the site bring noise and traffic congestion to the area. In addition, operations at the fairgrounds require use of water and wastewater services provided by the same suppliers as utilized by neighboring jurisdictions.
- The fairgrounds property is located directly adjacent to and north of the San Dieguito River and San Dieguito Lagoon, and directly east of the rivermouth outfall into the Pacific Ocean.

When sand builds up at the mouth of the lagoon, flooding can affect not only the fairgrounds property, but also neighboring residences located to the southwest. The lagoon restoration project is anticipated to solve this issue. However, at the time of the proposed project, frequent dredging of the lagoon mouth, usually by emergency permit through the CCC and U.S. Army Corps of Engineers (ACOE), was still an ongoing occurrence throughout the rainy season of each year.

- Despite implementation of the fairgrounds Storm Water Pollution Prevention Plan (SWPPP), proximity to the lagoon, Steven's Creek, and ocean raise community and agency concerns about the quality of water runoff, particularly the "first flush" of the rainy season. Concern is heightened given occurrence of horse manure and trash from various fairgrounds events.

The Racetrack Engineered Surface Project itself was contentious throughout the local community, primarily because it occurred in the midst of preparation of an update to the Fairgrounds Master Plan and Master Plan EIR, intended to provide a land use planning framework for the fairgrounds property over the next 15 years. Community members, resource agencies, and other interested parties were concerned by the prospect of the project moving forward independent of the master planning process. However, conversion of existing dirt equestrian tracks to engineered surfaces was mandated by the California Horse Racing Board, who required that they be completed by December 31, 2007, well in advance of the Master Plan and Master Plan EIR's anticipated completion schedule. The Final IS/MND was approved by the 22<sup>nd</sup> DAA Board of Directors in November 2006. The Master Plan and Draft Master Plan EIR were released for public review on October 23, 2009 (City of Del Mar, 2009), and approved by the 22<sup>nd</sup> DAA Board of Directors in April 2011 (10News, 2011).

### **3.1 Approach to Conflict Resolution**

Resolution of potential project conflicts was carried out primarily through implementation of CEQA-required public review processes, as well through a stakeholder-involvement process. Establishing an inclusive process that incorporates stakeholder input is an important component of CEQA documentation, project permitting, and land use planning. The concept of stakeholder involvement is that the long-term success of a planning effort ultimately depends on the degree to which agencies and

stakeholders can effectively be brought together toward the identification of common objectives and the development and implementation of strategies to achieve them. Essentially, the idea is that by providing individuals, agencies, and organizations the chance to be involved from the early project planning level phase, to contribute to the shape and direction of project development, and to be involved in the technical discussions as to why certain approaches are preferred and/or feasible allows stakeholders the chance to feel connected to, and have a sense of ownership and “buy-in” over the ultimate direction of a project.

Stakeholders involved in Project development and review included regulatory agencies (e.g. CCC), local jurisdictions (e.g. cities of Del Mar and Solana Beach), special interest groups (e.g. SDRP), and interested members of public (e.g. individual neighbors). The following discussion describes how this approach was incorporated throughout the Project at various project phases.

### **3.1.1 CEQA Public Notice Process**

State CEQA Guidelines require public notice and involvement during preparation and approval of a MND. Section 15072 requires that a Notice of Intent (NOI) to adopt a ND or MND be circulated for public review as follows:

- Provided to the public, responsible agencies, trustee agencies, and the county clerk of each county within which the proposed project is located prior to adoption by the lead agency of the MND;
- Mailed to owners and occupants of property contiguous to the Project site, as well as all organizations and individuals who have previously requested such notice in writing;
- Published at least one time in a newspaper of general circulation in the area affected by the proposed project; and
- Posting of notice by the lead agency on and off site in the area where the project is to be located.

Section 15073 requires that the Lead agency provide a public review period of not less than 20 days, but up to 30 days when a proposed MND and IS are submitted to the State Clearinghouse for review by state agencies. This section also requires a copy of the proposed MND and IS be attached to the NOI that is sent to every responsible agency and trustee agency concerned with the project and every other public agency with jurisdiction by law over resources affected by the project.

The Project complied with all public notification requirements. Unlike projects requiring EIR documentation, projects requiring an MND do not require a public scoping meeting be held. However, through two rounds of the Draft IS/MND, notice and opportunity to participation in the public review process was amply provided. The 22<sup>nd</sup> DAA maintains lists of parties who have expressed interest in activities at the fairgrounds, as well as local, state, and federal agencies with an interest, and neighboring property owners as required under CEQA and the CCA. This collective “interested parties list” represents the parties to whom the NOI was distributed to review and comment.

Upon receipt of the first round of comments, and the additional testing and agreements required as discussed below, the Draft IS/MND had been revised sufficiently that the 22<sup>nd</sup> DAA re-circulated the document to the interested parties list for an additional 30-day public review period. Re-circulation thereby allowed stakeholders to review the results of their participation efforts prior to consideration of the Project and IS/MND for approval by the 22<sup>nd</sup> DAA Board of Directors. Like other components of stakeholder involvement discussed below, the result was a much greater level of support for the Project by parties previously opposed.

### **3.1.2 Stakeholder Meetings**

Unlike for an EIR, CEQA does not include any requirement to hold a public scoping meeting during the preparation of an MND. Public outreach is generally conducted through the NOI public notification process described above. In the case of the Project, the only formal public “meeting” on the Project was the hearing by the 22<sup>nd</sup> DAA Board upon completion of the Final IS/MND. However, a good deal of electronic communication occurred, and small stakeholder meetings were held to ensure interested parties ideas and concerns were heard during the revision of the original Draft IS/MND.

One approach undertaken in this regard were meetings with Coastal Commission staff, and meetings with SDRP and Friends of the San Dieguito Lagoon (FSDL) representatives to clarify concerns and comments on the Draft IS/MND; clarify concerns and comments in regard to existing technical studies; and clarify the type and purpose of additional technical studies being requested.

A series of meetings with 22<sup>nd</sup> DAA, CCC, SDRP, FSDL, interested individuals, and myself as the CEQA document preparer allowed for all parties to discuss in person, rather than written exchanges, the individual goals, concerns, and motivations held by each party. 22<sup>nd</sup> DAA staff was able to provide further



explanation as to the positive attributes of the Project, such as much lower water use and less dust pollution during maintenance and racing activities, and also express their commitment to environmental protection. CCC staff explained their perspective in terms of ensuring consistency with the Chapter 3 policies of the CCA, which segued directly with other parties primary water quality and aquatic/ marine habitat preservation concerns. Through this process, a greater understanding and level of trust was established, despite a tumultuous history. The meetings also led to the agreement to pursue additional testing, as discussed below.

### **3.1.3 Use and Revision of Technical Studies**

As indicated above, prior to preparation of the IS, several technical studies had been prepared to identify potential impacts, serve as documentation of such impacts, and provide professional recommendations on how such impacts could be avoided or reduced to a level of less than significant.

Tests were conducted on leachate samples taken from the proposed Engineered Surface material to determine if pollutants might be released in runoff. Lab results did not detect any semi-volatiles or phenols in the leachate samples. The wax additive in Engineered Surface allows for water to flow vertically through the material and reduces suspended solids. Material Safety Data Sheets (MSDS) obtained from manufacturers show that the individual components, including the wax, carpet fibers, and silica sand of Engineered Surface are non-toxic.

Upon public comment, several agencies and organizations requested additional information on the Engineered Surface material to investigate potential impacts of the effluent discharge into the environment. Based on these comments, the Engineered Surface material was re-tested for Semi-Volatiles by EPA 8270C, Phenolics by EPA 420.1, Oil and Grease by EPA 413.1, Magnesium by EPA 6020, and Surfactants by EPA 425.1. Additionally, an intensive toxicity testing program was conducted to investigate whether the Engineered Surface material would pose a toxicity concern to indigenous flora and fauna. The results of the additional analytical testing confirmed the results of the initial testing. No chemicals were detected in the re-testing of the Engineered Surface material by EPA methods 8270 or 420.1. The toxicity testing results were consistent with the chemical analytical data, and there were no statistically significant responses between the maximum concentration of effluent (100%) and the control groups.

Completion of these additional tests lent an additional level of comfort to the 22<sup>nd</sup> DAA staff and concerned stakeholder parties. In addition, by having agreed to fund and conduct the tests, the 22<sup>nd</sup> DAA both demonstrated their commitment to environmental protection and community concerns. The side benefit was gaining an additional measure of support for the Project from previously opposing parties.

#### **3.1.4 Incorporation of a Final EIR-Model Response to Public Comments into the IS/MND**

State CEQA Guidelines Section 15132 requires that a Final EIR include “comments and recommendations received on the draft EIR either verbatim or in summary.” In common practice, this requirement has been translated to mean provision of each comment received, with a response to each comment provided. No such requirement exists for projects eligible for utilizing an MND to meet CEQA documentation compliance. However, for the Proposed Project, subject to a high level of public involvement and concern, it seemed an appropriate tool to incorporate into the MND process. As such, I proposed the idea to the 22<sup>nd</sup> DAA as a means to demonstrate to stakeholder parties that each of their comments had been acknowledged and addressed during the CEQA process. The 22<sup>nd</sup> DAA staff agreed to this proposal.

As a result, I incorporated a “Response to Comments” (RTC) Section into the Re-circulated Draft IS/MND for the Proposed Project. Based on Final EIR model, this section included a copy of all comment letters received, with each individual comment and/or concept coded for response. Responses to each of the coded comments were prepared pursuant to the stakeholder meeting discussions, additional technical study results, and other agreements, such as the MOU with the City of Del Mar, as developed during the public review process.

During the 22<sup>nd</sup> DAA Board of directors hearing on the Project, Board members acknowledged and praised this effort, along with the other public outreach efforts, in providing a very comprehensive document and accomplishing support amongst previously opposed stakeholder parties.

#### 4.0. Lessons Learned

- Lack of stakeholder involvement can backfire in the form of angry comment letters, letters to decision-makers and politicians, and opposing testimony at public hearings.
- Genuine stakeholder outreach, combined with actions to acknowledge and address stakeholder concerns, can turn angry and opposing stakeholders into project supporters.
- Technical studies provide expert opinion and recommendations on project issue areas; however, without participation throughout the project process, stakeholders are much more likely to mistrust the technical study preparer and CEQA planner, as well as the findings and recommendations of both the technical studies and the CEQA document.
- A Lead agency's commitment to an inclusive stakeholder involvement process pays off. Sometimes, it is worth it to pay for additional technical studies, revised site/engineering plans, and analysis in order to address stakeholder concerns and avoid project opposition down the road.
- Use of tools outside of those specifically required within a particular regulatory framework, in this case use of Final EIR RTC guidance to supplement CEQA MND requirements, can allow stakeholders to see their input in writing, thereby strengthening their commitment to the agreed-upon project.
- Simply listening to stakeholder concerns, and making sure you correctly understand the crux of the issue - and can repeat it back to them such that they know you understand - can make a big difference in your ability as a CEQA planner to achieve project approval and maintain good client, community, and stakeholder relationships.
- Communication barriers often exist as a result of the meaning of particular terms to various involved parties. The role of CEQA document preparer can include facilitating common understanding for the purposes of mediation amongst stakeholder groups, primarily due to the ability to translate various terms used by agency staff, engineers, and other team members across various disciplines.

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