

# Notice of Exemption

## Appendix E

**To:** Office of Planning and Research  
P.O. Box 3044, Room 113  
Sacramento, CA 95812-3044

County Clerk

County of: San Diego  
1600 Paific Hwy #260

San Diego, CA 92101

**From:** (Public Agency): 22nd District Agricultural Association  
2260 Jimmy Durante Blvd  
Del Mar, CA 92014

(Address)

Project Title: Paddock Reader Board Improvement Project

Project Applicant: 22nd District Agricultural Association (District)

Project Location - Specific:

The existing digital reader board is located on the roof of the paddock area side entrance of the Del Mar Fairgrounds' Racetrack and Grandstands Complex Facility, just south of the main racetrack, located roughly in the center of the District property.

Project Location - City: Del Mar Project Location - County: San Diego

Description of Nature, Purpose and Beneficiaries of Project:

The District is proposing the Paddock Reader Board Improvement Project (project), which would update an existing digital reader board within the Del Mar Fairgrounds property. The project would update the existing digital reader board's internal hardware and replace the existing exterior LED screen. The project would not expand the reader board's size, modify the existing roof that the reader board sits on, or modify the existing reader board structure itself.

Name of Public Agency Approving Project: 22nd District Agricultural Association

Name of Person or Agency Carrying Out Project: Dustin Fuller, Supervising Environmental Planner

Exempt Status: **(check one):**

- Ministerial (Sec. 21080(b)(1); 15268);
- Declared Emergency (Sec. 21080(b)(3); 15269(a));
- Emergency Project (Sec. 21080(b)(4); 15269(b)(c));
- Categorical Exemption. State type and section number: Section 15301, Existing Facilities (Class 1)
- Statutory Exemptions. State code number: \_\_\_\_\_

Reasons why project is exempt:

The project is consistent with the following exemption: repair or minor alteration of existing public facilities involving negligible or no expansion of use beyond that existing or planned for use under CEQA Guidelines, Section 15301. The project qualifies for this exemption because the project consists of the minor alteration of the existing reader board to update internal hardware and replace the existing LED screen. The project would not expand the reader board, modify the existing structure, or change the operation or use of the reader board compared to existing conditions.

Lead Agency

Contact Person: Dustin Fuller Area Code/Telephone/Extension: (858) 792-4212

**If filed by applicant:**

1. Attach certified document of exemption finding.
2. Has a Notice of Exemption been filed by the public agency approving the project? Yes No

Signature:  Date: 4/20/26 Title: Supervising Env. Planner

▪ Signed by Lead Agency      Signed by Applicant

Authority cited: Sections 21083 and 21110, Public Resources Code.  
Reference: Sections 21108, 21152, and 21152.1, Public Resources Code.

Date Received for filing at OPR: \_\_\_\_\_

# MEMORANDUM

**To:** Dustin Fuller, Supervising Environmental Planner, 22nd District Agricultural Association  
**From:** Janelle Firoozi, Senior Environmental Manager, Harris & Associates  
**Subject:** Paddock Reader Board Improvement Project Exemption Memorandum  
**Date:** April 17, 2026  
**Att:** 1, Figures

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## 1 Project Description

The 22nd District Agricultural Association (District) is proposing the Paddock Reader Board Improvement Project (project), which would update an existing digital reader board within the Del Mar Fairgrounds (Fairgrounds) property. The Fairgrounds is in coastal northern San Diego County, directly adjacent to the San Dieguito River and Lagoon, spanning across both the City of Del Mar and City of San Diego (Figure 1, Regional Location). The project site is in the outdoor paddock area of the Fairgrounds' Racetrack and Grandstands Complex Facility, just south of the main racetrack, roughly in the center of the District property (Figure 2, Project Site). The existing digital reader board is on the roof of the paddock area side entrance, facing north. Because the project site is in the interior of the Racetrack and Grandstands Complex Facility, the immediate surrounding uses are District and equestrian-related facilities, including the paddock lawn north of the project site, District offices east and west of the project site, and a courtyard and side entrance to the paddock area south (and below) of the project site, with a parking lot farther south.

The project would update the existing digital reader board's internal hardware and replace the existing exterior light-emitting diode (LED) screen. The project would not expand the reader board's size, modify the existing roof that the reader board sits on, or modify the existing reader board structure itself. Additionally, the operation and use of the reader board would not change compared to existing conditions, as there would be no change in hours of operation of the reader board or in the direction that it faces.

## 2 Qualifications for a Categorical Exemption

The California Environmental Quality Act (CEQA) Guidelines, Section 15300, includes a list of classes of projects that have been determined not to have a significant effect on the environment and are exempt from the provisions of CEQA. Project actions on the project site are applicable to CEQA Guidelines, Section 15301 (Class 1).

Per CEQA Guidelines, Section 15301, Existing Facilities, Class 1 consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographic features involving negligible or no expansion of use beyond that existing at the time of the lead agency's determination. The key consideration is if the project involves negligible or no expansion of an existing use.

Per CEQA Guidelines, Section 15300.2, Exceptions, the exceptions to the use of a Class 1 categorical exemption are as follows:

- a. **Location.** Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located—a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.
- b. **Cumulative Impact.** All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.
- c. **Significant Effect.** A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.
- d. **Scenic Highways.** A categorical exemption shall not be used for a project that may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements that are required as mitigation by an adopted negative declaration or certified EIR.
- e. **Hazardous Waste Sites.** A categorical exemption shall not be used for a project located on a site that is included on any list compiled pursuant to Section 65962.5 of the [California] Government Code.
- f. **Historical Resources.** A categorical exemption shall not be used for a project that may cause a substantial adverse change in the significance of a historical resource.

### 3 Project Findings in Support of a Categorical Exemption

The project is consistent with the repair or minor alteration of an existing public or private structure involving negligible or no expansion of use beyond existing use, as permitted under the Class 1 categorical exemption under CEQA Guidelines, Section 15301. The project qualifies for this exemption because the project consists of the minor alteration of the existing reader board to update internal hardware and replace the existing LED screen. The project would not expand the reader board, modify the existing structure, or change the operation or use of the reader board compared to existing conditions.

Based on an examination of the project and supporting information, the exceptions to using the Class 1 categorical exemption for the project would not apply, as described below:

- a. **Location.** This exception only applies to Classes 3, 4, 5, 6, and 11 and does not apply to Class 1, which is being used to exempt the project. The project would have no impact based on location. This exception does not apply to the project.
- b. **Cumulative Impact.** The project includes improvements to the existing digital reader board within the Racetrack and Grandstands Complex Facility and paddock area of the Fairgrounds. There are no other currently planned or reasonably foreseeable construction projects anticipated in the Fairgrounds area during the same time period. Therefore, the project, when considered together with other past, present, or reasonably foreseeable projects, would not result in a significant cumulative impact. This exception does not apply to the project.
- c. **Significant Effect.** Project construction would be conducted in accordance with federal and state regulations, such as the California Building Code. Additionally, the project would be constructed in accordance with the District's Noise Ordinance. The project site is developed, with no natural habitats or other sensitive

environmental resources. Additionally, the project would not require any ground disturbance. The project is not population-generating and would not have population-driven effects. Following construction, the reader board would operate similarly to current conditions. While the project would replace the reader board's LED screen, the reader board faces internally to the paddock area and would not be seen from public viewpoints and would not create a new source of substantial light or glare compared to existing conditions. Therefore, there is no reasonable possibility that the project would have a significant effect on the environment due to unusual circumstances. This exception does not apply to the project.

- d. **Scenic Highways.** Interstate 5, approximately 1.5 miles east of the project site, is eligible but not officially designated as a state scenic highway by the California Department of Transportation (Caltrans 2018). Additionally, the project site is not visible from the highway due to distance and intervening structures. Therefore, no impacts on scenic highways or resources would occur. This exception does not apply to the project.
- e. **Hazardous Waste Sites.** Research was conducted on lists that compose the Cortese List (California Government Code, Section 65962.5). The California Department of Toxic Substances Control EnviroStor database includes the entirety of the Fairgrounds property as a Formerly Used Defense Site. However, the site is listed as inactive and is associated with the U.S. Marine Corps using the site as Camp C.J. Millar in the 1940s for military training, including running, horse riding, and hand-to-hand combat training at the Fairgrounds horse stalls and racetrack (DTSC 2026). The U.S. Marine Corps discontinued their use of the Fairgrounds in 1943. The site's category of hazard is listed as "none." Further, the State Water Resources Control Board GeoTracker list does not identify any open sites within 1,000 feet of the project site (SWRCB 2026). Therefore, implementation of the project would have no impact on hazardous materials exposure. This exception does not apply to the project.
- f. **Historical Resources.** According to the 2009 Del Mar Fairgrounds Master Plan Project Environmental Impact Report, the Grandstands Complex Facility (including the paddock area) was completely rebuilt between 1992 and 1993 (District 2009). According to communication with the District, the existing digital reader board was installed in the late 1990s (District 2026). Therefore, the digital reader board (and larger Grandstands Complex Facility) does not meet the threshold of 50 years to be considered historical, and the project would not cause a substantial adverse change in the significance of a historical resource. This exception does not apply to the project.

The project constitutes a single and complete project and functions independently of any other improvements to meet the stated purpose. For the reasons stated previously, the project is categorically exempt from CEQA.

## 4 References

Caltrans (California Department of Transportation). 2018. "California State Scenic Highway System Map." Accessed April 2026. <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>.

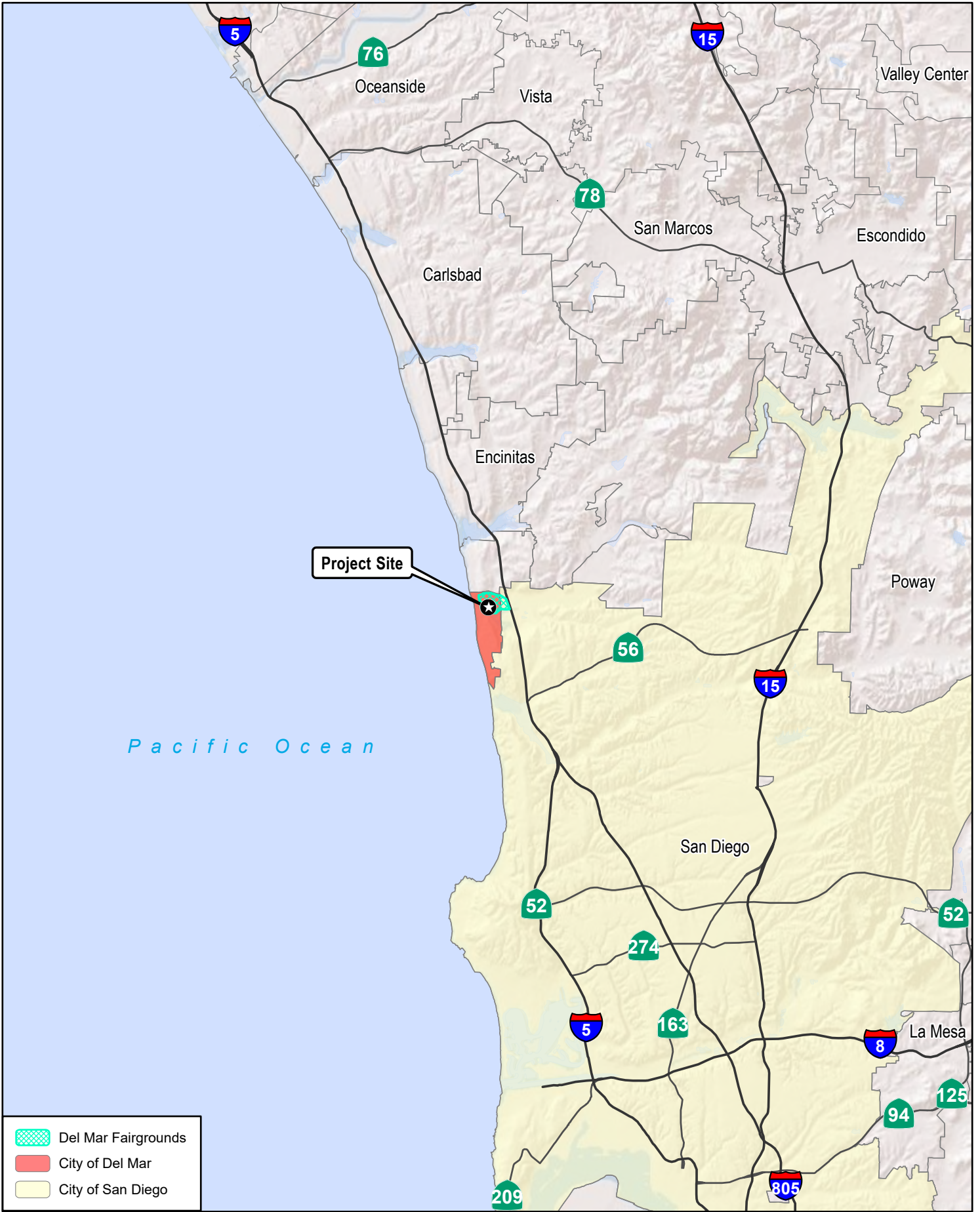
District (22nd District Agricultural Association). 2009. Del Mar Fairgrounds Master Plan Project Environmental Impact Report. October.

District. 2026. "Paddock Reader Board." Email from Dustin Fuller (22nd DAA/Del Mar Fairgrounds) to Janelle Firoozi (Harris & Associates). April 3.

DTSC (California Department of Toxic Substances Control). 2026. EnviroStor Database. Accessed April 2026.  
<https://www.envirostor.dtsc.ca.gov/public/>.

SWRCB (State Water Resources Control Board). 2026. Geotracker Database. Accessed April 2026.  
<https://geotracker.waterboards.ca.gov/>.

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Source: ESRI, 2025.



**Figure 1**  
Regional Location

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