

# DEL MAR FAIRGROUNDS

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## NUTRIENT MANAGEMENT PLAN

City of Del Mar, CA

**Prepared For:**

STATE OF CALIFORNIA 22<sup>ND</sup> DISTRICT AGRICULTURAL ASSOCIATION  
DEL MAR FAIRGROUNDS  
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## ACRONYMS

22 <sup>nd</sup> DAA	22 <sup>nd</sup> District Agricultural Association
AFO	Animal Feeding Operation
amsl	above mean sea level
bgs	below ground surface
BMP	Best Management Practice
BOD	Biological Oxygen Demand
CAFO	Concentrated Animal Feeding Operation
CFR	Code of Federal Regulation
DMTC	Del Mar Thoroughbred Club
FEMA	Federal Emergency Management Association
NMP	Nutrient Management Plan
NPDES	National Pollutant Discharge Elimination System
ROWD	Report of Waste Discharge
RWQCB	Regional Water Quality Control Board
SWMP	Storm Water Management Plan
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
US EPA	United States Environmental Protection Agency
WDR	Waste Discharge Requirement

## 1 INTRODUCTION

This Nutrient Management Plan (NMP) is prepared in accordance with 40 CFR 122.42 and is prepared as part of the Report of Waste Discharge (ROWD) submitted on June 8, 2017 and amended December 1, 2017 based on design changes to the proposed CAFO Stormwater Improvement Project ("CAFO Project"). The CAFO Stormwater Improvement Project that is currently undergoing final design with construction anticipated to start in 2018.

The Del Mar Fairgrounds ("Fairgrounds"), operated by the 22<sup>nd</sup> District Agricultural Association (DAA), is a multi use facility of approximately 300 acres in the City of Del Mar (see Exhibit 1.0 Vicinity Map). The Fairgrounds hosts approximately 350 activities and events throughout the year. The presence of various animals at the Fairgrounds (primarily thoroughbreds) throughout the year trigger's certain Federal and State regulatory requirements specifically involving stormwater discharges described in more detail below.

### 1.1 CAFO REGULATORY REQUIREMENTS

The Del Mar Fairgrounds is designated as a Large Confined Animal Feeding Operations (CAFO), as the facility houses over 499 horses for a period of 45 days or more each calendar year. The primary activity which triggers the Large CAFO status is the housing of thoroughbred horses during the 48-day summer thoroughbred horse racing meet ("Summer Meet"), which takes place annually from mid July through Labor Day (first Monday of September). During the Summer Meet, approximately 2,200 horses are stabled for the duration of the race meet. Following the Summer Meet, a fall race meeting ("Fall Meet") occurs for the month of November. For this Fall Meet, approximately 1,200 horses are stabled for 35 days. Both race meets are currently operated by the Del Mar Thoroughbred Club (DMTC). In addition to the race meets, the Fairgrounds hosts the 22-day San Diego County Fair, which takes place annually in June-July. During the annual Fair, the majority of the Fairgrounds property is utilized for a variety of activities, including livestock exhibits and horse shows. On average, the annual Fair features between 400 to 800 animals on-site (within dedicated CAFO production areas), depending on the day and exhibits presented. There are several other equestrian-related events held throughout the year at the horse arena on-site, which typically last between 3-5 days and can feature up to 500 to 700 animals on-site.

Once a facility is designated as a Large CAFO, it must determine which portions of the site are within the "production area" in accordance with 40 CFR 122.23. The CAFO production area designation is based on the definition stated in 40 CFR 122.23, the US EPA's CAFO Final Rule. "Production Area" is defined as "that part of an animal feeding operation (AFO) that includes the animal confinement area, the manure storage area, the raw materials storage area, and the waste containment areas." This includes the pathways within these areas as well as other confined facilities such as hot walkers and equine treadmills.

The following areas have been identified as CAFO production areas at the Del Mar Fairgrounds (see Section 2.1 for further descriptions of these areas):

- Backstretch Stable Area (“Backstretch”): The Backstretch refers to the stable buildings, structures or barns, including horse stalls. These areas are the locations where animals are housed during the various animal related events on the property. This area also includes all temporary and permanent storage areas for manure, bedding, and animal waste.
- Barn W Area: The area that includes the Arena, Barn W, Expo Center, Wyland Center, and the Activity Center. These structures house animals and/or include animal related events throughout the year. Similar to the Backstretch area, the Barn W Area also includes temporary and permanent storage areas for manure, bedding, and animal waste. Manure disposal details area described in more detail below and in Exhibit 7.

All other areas of the Fairgrounds property (i.e. parking lots, administrative buildings) are subject to the Phase II MS4 Permit.

## 1.1 CAFO COMPLIANCE

Based on CAFO regulations (40 CFR 412.10 & 412.13), any stormwater discharges from the CAFO production areas at the Fairgrounds (Backstretch and Barn W Area) must be contained up to the 25-year, 24-storm event. Discharges from these areas are only allowed for rain events that exceed the 25-year, 24-hour storm event. The 22nd DAA has recently completed several improvement projects that support this goal and is currently under final design for the CAFO Stormwater Improvement Project (CAFO Project) which is anticipated to start construction in 2018 and be complete by 2021. The CAFO project features include the design of an infield lake/wetland treatment system which will receive all stormwater runoff from the CAFO production areas up to the 25-year storm event. Due to the nature of the drainage patterns at the Fairgrounds, some other MS4 drainage areas will also be picked up and treated within the infield lake/wetland system that will further benefit water quality. For example, the existing dirt race track, turf track, infield drainage and the racetrack tarmac drainage area will be part of the CAFO Project. Once stormwater is captured, it will be treated through a large constructed wetland and a stand-alone treatment plant. Following treatment, it will ultimately discharge out of Discharge Point 2 (“DP 2”) with specific numeric effluent limits as defined in a Consent Judgement. Upon completion of the project, the IGP Permit coverage will be amended to include DP 2 as the only outfall covered by IGP/CAFO and the Consent Judgement<sup>1</sup>. The remaining outfalls will only include discharges from MS4 land uses and will be monitored as such.

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<sup>1</sup> On May 12, 2016 the Facility, the United States Environmental Protection Agency (“EPA”), EPA Region IX, the State Water Resources Control Board (“State Board”), and the San Diego Regional Water Quality Control Board (“Regional Board”) received a notice of intent to file suit (“Notice Letter”) from the Coastal Environmental Rights Foundation (“CERF”) and the San Diego CoastKeeper (together “Plaintiffs”) under Sections 505(a) and (b) of the Clean Water Act, 33 U.S.C. §§ 1365(a) and (b). The Notice Letter alleged violations of Section 301(a) of the Clean Water Act, 33 U.S.C. § 1311(a), and violations of the 2014 IGP and the 1997 IGP at the Facility. On or about November 27, 2017 the Facility and counsel for Plaintiffs finalized a Consent Judgement. It is anticipated that the Consent Judgment will be reviewed and approved by the United States Department of Justice (“DOJ”) and US EPA on or about January 15, 2018 and ordered by the Court on or about February 1, 2018.

## 1.2 STORM EVENT PROCEDURES

The function of this document is to outline procedures to reduce water quality impacts to surface waters from CAFO discharges. The Del Mar Fairgrounds is located adjacent to the San Dieguito River, and the downstream Pacific Ocean Shoreline at the San Dieguito River was listed as impaired for bacteria indicators on the 2002 303(d) list of Limited Water Quality Segments prepared by the San Diego RWQCB. In addition, the Fairgrounds property is bounded on the west by Stevens Creek, a tributary to the San Dieguito River (see Exhibit 2.0 Watershed Map). Horse manure originating from the Del Mar Fairgrounds contains compounds which are harmful to surface water beneficial uses outlined in the Water Quality Control Plan for the San Diego Basin<sup>2</sup> (also known as the Basin Plan). Harmful pollutants found in horse manure include fecal coliform, enterococcus, nutrients, as well as biological oxygen demand (BOD) and other water quality indicators.

In general, storm water runoff within the Fairgrounds is generally conveyed west, southwest, and south, ultimately discharging off-site at five major discharge points. Under existing conditions, the first 0.2 inches of runoff from the stable area is diverted to the sanitary sewer through the sanitary sewer diversion located at the training track pump station. Following this initial amount, the diversion is turned off, and runoff then discharges to Stevens Creek. Upon completion of the CAFO Project, flows will no longer discharge to Stevens Creek and will be routed to the infield Receiving Lake. It is important to note the ability to divert the first 0.2" of runoff to the sanitary sewer will be preserved with the CAFO Project. During rain events, horse activities in the Stable area are highly limited and horses are only allowed to use the covered wash racks tied directly to sewer. During rain events, all horses are directed to their stalls within the Backstretch/Stable area or inside the arena, and exposure to storm water is limited. This operational requirement helps protect water quality by horses and horse activities during rain events. Sewer diversions are discussed further under Section 4 of this report.

According to FEMA Map No. 06073C1307-F (see Exhibit 3.0), portions of the Fairgrounds property are located within the floodplain of the 100-year storm event. However, both the Stable area and the Barn W area are located outside the 25-year flood plain. As part of the flood analysis for the site, it was identified that Stevens Creek would overtop and flood the Stable area in a 25-year storm event. Based on this finding, the berm height of Stevens Creek was increased to eliminate the threat of flooding during a 25-year storm event to avoid comingling of flood waters with CAFO surface water runoff from the Backstretch area. In addition, the dedicated roof drain system implemented in the Stable area is designed with a 25-year conveyance capacity to avoid co-mingling with CAFO surface runoff within the Stable area.

Groundwater is anticipated to be at depths ranging from 5 to 10 feet bgs, and is subject to tidal influence and seasonal variations resulting in saline conditions for such features as the infield lakes that are influenced by groundwater conditions in the area.<sup>3</sup> As part of the CAFO Project, the infield lakes will be dewatered and re-graded and lined with impermeable liners to

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<sup>2</sup> San Diego Regional Water Quality Control Board (RWQCB). Water Quality Control Plan for the San Diego Basin. September 8, 1994.

<sup>3</sup> Ninyo & Moore. Supplemental Groundwater Depth Measurements Del Mar Fairgrounds Backstretch Improvements Phase II. November 17, 2016.

prevent discharges to groundwater and prevent saline influences originating from groundwater from entering the lakes.

The application of nutrient fertilizers or manure onto land within CAFO production areas is not conducted onsite. Therefore, nutrient loadings as a result of land applications of fertilizer and/or manure are not a concern. The main focus of this NMP will be the procedures taken to ensure that CAFO related discharge is not allowed to enter surface waters surrounding the facility. By continuing to implement the management practices outlined in this report, as well as heed recommendations for future practices, the beneficial uses of nearby water resources will not be compromised.

## 2 FACILITIES DESCRIPTION

### 2.1 CAFO PRODUCTION AREA FACILITIES

As previously mentioned, “CAFO production area” refers to the areas of operations that includes the animal confinement areas, manure storage areas, raw materials storage areas, and waste containment areas and the pathways connecting these areas.<sup>4</sup> Refer to Exhibit 4.0 Site Plan for the locations of the facilities listed below, and Exhibit 5.0 for a breakdown of the Large CAFO production areas. The remainder of this NMP focuses on the CAFO-areas.

#### BACKSTRETCH STABLES

The main horse stable area located north and east of the main track is generally known as the Backstretch area (see Exhibit 5.0). Stables include those barns located in the Backstretch area, labeled Barns “A” through “U” and “EE” through “TT”. Each barn contains individual stalls which may be used by one or multiple horses. A total of 1930 permanent stalls are located on-site. Additionally, up to 200 temporary stalls are constructed during the thoroughbred race meet within the Backstretch area.

Stalls are filled with straw or wood shaving bedding, and are the primary residence for horses when they are not training, being washed, groomed, or transported. All permanent barns located on-site are roofed, and rainwater is collected into a dedicated roof drain system from all stalls and building rooftops within the Backstretch area. In addition, the stalls are walled and slightly elevated such that runoff does not drain towards the stalls nor does runoff from the pathways drain into the stalls.

The Backstretch area also includes covered horse wash racks for washing down the horses. All wash water from the wash racks does is routed to the sewer system.

#### BARN W AREA

The Barn W Area refers to the collection of buildings, pathways and hardscape areas on the southeastern portion of the site adjacent to the racetrack where horses are stabled during the race meets and the other animal events are held throughout the year including the annual Fair. The Barn W Area refers to Barn “W”, the Expo Center, the Wyland Center, the Arena and the Activity Center.

Barn “W” is a livestock barn located within the Barn W Area adjacent to the horse arena. Barn “W” is used for material storage throughout the year, and provides temporary housing of various animals during the County Fair as well as during the racing season. Barn “W” is equipped with 2 indoor sanitary sewer connected wash racks that are covered, and the western side of the barn has areas for temporary horse stalls.

The Expo Center is a facility which temporarily houses animals during the San Diego County Fair, and horses during the horse race meet. During the County Fair, general livestock exhibits and shows are held here, with animals residing here only temporarily for the duration

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<sup>4</sup> In accordance with 40 CFR Section 142.2(h)

of the exhibit. Throughout the majority of the year, the Expo Center does not house animals, and serves as the home of the Del Mar Sports Center, an indoor multipurpose athletic facility. This facility is also equipped with 16 indoor wash racks connected to the sanitary sewer.

The Wyland Center is an exhibit hall which temporarily houses animals during the San Diego County Fair as well as horses during the race meet. The animals temporarily housed here during the County Fair are usually small animals which are on exhibit, and do not have permanent stalls. The majority of the year, the Wyland center is an exhibit hall which is utilized for a variety of events, conferences, and trade shows. This facility is equipped with 9 indoor wash racks connected to sanitary sewer.

The Activity Center is located south of the Wyland Center, and is primarily used as a detention and receiving barn for horses during the race meet, and is used as an exhibit hall during the County Fair and other events throughout the year. The Activity Center is equipped with 4 indoor wash racks which are connected to the sanitary sewer.

The Arena is located east of Barn W and is a multipurpose facility which is used to house events such as concerts, horse shows, bull riding and other animal events. The Arena is covered by a roof structure and it is not exposed to rainfall. The interior of the Arena is connected to the sanitary sewer system.

The following table summarizes the existing CAFO production surface areas at Del Mar Fairgrounds subject to 25-year, 24-hour retention requirements. Refer to Exhibit 4.0 for locations of the barn facilities, and Exhibit 5.0 for locations of the wash rack facilities.

CAFO AREA	SIZE	# OF WASH RACKS
Backstretch Area	31.3 acres	74
Barn W Area	8.8 acres	31
<b>Total CAFO Production Area</b>	<b>40.1 acres</b>	<b>105</b>

### 3 MANURE MANAGEMENT OPERATIONS

#### 3.1 RACING SEASON MANURE MANAGEMENT

The Del Mar Fairgrounds is committed to consistently implementing effective protocols concerning collection, storage, and removal of manure and animal related waste. The two horse race meets bring some of the nation's most prestigious horses, owners, and jockeys to the facility each year, and horse stable cleanliness is of the utmost importance. The investment involved in owning and training thoroughbred horses is very high, and the 22<sup>nd</sup> DAA and DMTC do not condone substandard conditions and cleanliness. Therefore, the requirement of proper handling and storage of manure is in effect at all time. The racing season is a business, and any perception of below average conditions can be equated to a loss of revenue for the facility.

During the race meets, manure/waste removal and storage is conducted in an ongoing fashion. Horse manure, soiled straw bedding and wood shavings are collected from inside the horse stables from around 6 am to sundown. The material removed is individually raked out from the inside of each horse stable and piled at the end of the barn row for immediate hauling. Manure and bedding material is normally removed when horses are on the track or at the paddock, resulting in a scenario where stable cleaning is conducted throughout the day. Exhibit 7.0 shows the locations of the temporary piling locations at the end of each barn.

The material is collected in a temporary pile outside the stables until it can be loaded into one of several semi-trailers which continuously haul the material off-site. The length of time that waste is temporarily piled is often brief, usually consisting of the time required for heavy machinery to load the material onto the semi-trailer. Based on the "event only" operations (no seasonal or long-term/permanent boarding operations), there are no permanent manure storage facilities. Each time an event requires horse stabling, semi-trailers to collect and haul off manure and waste are utilized on a daily basis. Due to the large number of occupied stalls during the racing season, the removal, loading and hauling process requires fast paced and continuous work. The hauling routes for manure collection are shown on the Exhibit 7.0.

Any temporary stalls located in the Barn W Area including Barn "W", the Expo Center, the Wyland Center, and the Activity Center are cleaned out in a similar fashion. Manure and bedding material is removed from the temporary stalls and piled in designated areas on the north and south sides of Barn "W", and between the Expo Center and the Wyland Center (see Exhibit 7.0). This material is loaded into a semi trailer shortly after the material is stockpiled for removal from the site.

Any manure found in non-stable areas, including walkways between the barns, the racetrack, training track, or anywhere else horses may be located, is quickly removed upon sight by DMTC staff and taken to a temporary piling area at the end of the barns and added to the bedding waste awaiting removal from the site.

The service contracted to haul all manure and bedding material delivers the majority to a Mushroom Farm in Escondido, CA. It takes approximately 4 months for the straw and manure waste to compost at the farm, with the product ultimately used in the mushroom growing

process. Additional wood shavings and manure are delivered to a facility in Lakeside, CA, where it is converted to compost and humus. Since 1990, approximately 100% of all stable manure and bedding is recycled in this or a similar fashion. Records are kept on the amount of manure and waste removed from the site per manifests and invoices prepared by the hauling company. Between 65,000-80,000 tons of manure are removed each year.

### **3.2 SAN DIEGO COUNTY FAIR MANURE MANAGEMENT**

The San Diego County Fair is held annually at the Del Mar Fairgrounds in June and July. In addition to a variety of recreational activities, the Fair hosts several livestock exhibits and horse shows. Various species of farm animals such as swine, sheep, goats, cattle, llamas, dogs, cats, and poultry are shown in livestock shows and exhibits held during the Fair. The exhibit animals are primarily housed in the livestock barns located adjacent to the arena, including Barn "W", the Expo Center and Wyland Center. The Backstretch barns may also provide additional housing for exhibit animals, depending on the day and exhibits presented. Below is a breakdown of the primary facilities used for the animal exhibits:

- The Wyland Center hosts the Agrifair which include rabbits, pigeons and a pig pen along with a chick hatchery. The Wyland Center also features pastures that will include goats, cattle and sheep, baby animals, and other small animal exhibits.
- The Expo Center serves as the main livestock barn concerning exhibiting animals to the public.
- Barn "W" houses various other animals, and is not home to any public exhibits.

Bedding for fair animals located in barn areas consists of wood shavings, except for sheep and goats which have beddings of straw. The exhibitors are required to clean out bedding for their exhibits daily by 7 am using dry cleaning methods. The waste is to be removed by the exhibitors and conveyed by wheelbarrow toward a covered 40 yd. dumpster located outside of the barns. The material is stored in the bin until the haulers arrive to remove the material and take it off site for recycling (see Exhibit 7.0 for locations and hauling routes). If exhibitors do not adequately clean the area, 22<sup>nd</sup> DAA staff is responsible for maintaining acceptable conditions. Under no circumstances shall exhibitors stockpile the manure and bedding in any area where it is potentially exposed to storm water runoff.

Outdoor animal exhibits utilized during the County Fair are only temporary in nature, and are removed following the activities of the day. No animals or animal bedding are out left overnight exposed to potential precipitation. The bedding material is completely removed at night and replaced with fresh material at the beginning of the day.

Animals housed in the stable areas in the backstretch area have manure management identical to the procedure outlined for the thoroughbred racing season, as discussed in Section 3.2. Hauling of bedding is accomplished daily in a similar fashion as during the thoroughbred racing season, and is recycled off-site.

### **3.3 DEL MAR ARENA MANURE MANAGEMENT**

Animal events held Del Mar Arena primarily consists of horse shows, including the prestigious Del Mar National Horse Show held annually in late April-early May. This is the largest horse show event of the year, and can involve as many as 1,000 horses. The majority of other horse show events held at the arena feature significantly fewer horses, and are typically between 3 to 5 days in length and house up to 500 to 700 animals on-site.

The shows are comprised mostly of jumping, dressage, and western events. Horses involved in the events are stabled in the Backstretch stables area, similar to the thoroughbred race season. Animals are housed within Barns "A" through "G", depending on the size of the event. Bedding and manure removal is achieved in an identical fashion as mentioned for the racing season under Section 3.1. Horse manure, soiled straw bedding and wood shavings are collected from inside the horse stables. The material is collected in a temporary pile outside the stables until it can be loaded into one of several semi-trailers which haul the material off-site on a daily basis at a minimum. The fast turnaround between horse shows creates the necessity of changing and hauling the bedding material very fast, usually quicker than during the thoroughbred racing season. Often the material must be removed from the stockpiles at the end of the row within a short time period, in order to begin accepting horses for the next event.

## 4 PROCESS WASTEWATER MANAGEMENT

The term “process wastewater” refers to “water directly or indirectly used in the operation of an AFO for any or all of the following: spillage or overflow from animal or poultry watering systems; washing, cleaning, or flushing pens, barns, manure pits, or other AFO facilities; direct contact swimming, washing or spray cooling of animals; or dust control. Process wastewater also includes any water which comes into contact with any raw materials, products, or byproducts including manure, litter, feed, ... or bedding.”<sup>5</sup>

The 22<sup>nd</sup> DAA has implemented measures to completely eliminate the discharge of process wastewater from the CAFO production areas at Del Mar Fairgrounds through the combination of the following practices:

- Routing all horse wash waters to the sanitary sewer;
- Placing roofs or covering all horse stalls, barns, and stables to route precipitation around the CAFO production areas through a dedicated roof drain system;
- Storage of all contaminated bedding materials (manure-soiled bedding), feed, and manure indoors or in covered storage facilities such that storm water does not contact these materials;
- Temporary manure stockpiles are removed daily such that they do not come into contact with storm water runoff;
- Horse presence is limited to the maximum extent practicable to the covered CAFO production areas (stables/barns) during rain events and when necessary;
- Implementation of good housekeeping practices such that any manure inadvertently deposited outdoors in the CAFO production area and non-production area is removed before pollutants from these materials can be entrained in storm water runoff.

### 4.1 CAFO PRODUCTION AREA DESIGN

#### BARN AND STABLE DESIGN

The barn structures as well as the wash rack facilities and other CAFO production areas on-site are designed to preclude precipitation and storm water runoff from coming into contact with these areas. All on-site barns are roofed to completely cover all horse stalls on-site. Runoff from the roof is conveyed via downspouts into a dedicated roof drain system that covers the entire Backstretch area and does not come into contact with the horse stalls or CAFO ground surfaces. In addition, any temporary stalls utilized on-site are also covered or are placed indoors to preclude rainfall from entering the stall. Further, the barns are walled to enclose horse stalls, and are constructed at a slightly higher elevation than walkways to preclude runoff from entering the stalls. Runoff generally drains away from the barn structure toward the storm drain inlets placed throughout the site. Once the infield lake system is complete, all runoff from the dirt surfaces within the stable area will be redirected to the

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<sup>5</sup> 40 CFR Sections 122.23 and 412.2(d)

infield/lake system for retention and treatment of stormwater flows up to the 25-year storm event.

#### BARN W AREA (including Barn W, Expo Center, Wyland Center, Arena and Activity Center)

The Barn W Area is part of the CAFO production area covered by the Large CAFO designation. Although most of the animal confinement areas takes place within the buildings during the race meets, the annual fair and the season events, the pathways that connect all these buildings are considered within the CAFO production area and are subject to the 25-year, 24-hour storm event containment requirements. To minimize water quality impacts, all roof tops within the Barn W Area will be collected into a new dedicated roof top storm drain system as part of the CAFO Stormwater Improvement Project and continue to discharge to Discharge Point # 5. In addition, more storm drain inlets will be added to ensure all runoff from the CAFO surface areas (dirt, asphalt, concrete) will be collected and diverted to a new lift station which will pump flows up to the 25-year storm event into the Receiving Lake within the infield area.

#### HORSE WASH RACK DESIGN

Horses are washed at designated wash racks properly designed to minimize discharge of pollutants to receiving waters. Within the Backstretch area and Barn W Area, there are several covered concrete-pad wash racks which connect to sewer. In the Backstretch Area, the wash racks are located adjacent to several of the barns in the northern portion of the backstretch area. In addition, during the racing season, wash racks within the walkways between the barn structures are utilized. These generally consist of rubber mats surrounding a grated inlet. These grated inlets discharge into the main collection system within the backstretch area, which connects to the pump station adjacent to the training track and pumps flows to the sewer system.

There are also covered horse wash racks adjacent to the barns located outside of the Backstretch area. There are 2 wash racks located adjacent to Barn "W", 16 wash racks at the Expo Center, 9 wash racks at the Wyland Center, and 4 wash racks at the Activity Center. These wash racks are covered and feature direct sewer connections. When in use, all wash racks discharge wash water to the sanitary sewer system.

## **4.2 ADDITIONAL NON-CAFO SEWER DIVERSIONS**

Similar to the Backstretch stable area, storm water runoff from Barn W area where horses and animals frequent is diverted to the sewer system when animals are present. In this area, the sewer inlets are located adjacent to the storm drain inlets (see Exhibit 4.0 for locations). Diversions are currently manually controlled through a cap on the riser pipes/inlets to the sewer and storm drain systems, and require field staff to manually cap the sewer or storm drain inlets during diversions. Upon the completion of the CAFO Stormwater Improvement Project, the 22<sup>nd</sup> DAA will maintain the ability to divert the initial storm flows from the Barn W area to the sewer system if deemed necessary.

### 4.3 PROCESS WATER CALCULATIONS

The City of Del Mar monitors the total sewer flow that exits the Del Mar Fairgrounds site and enters the City's sewer system. Flows are measured on a daily basis at the southern end of the primary sewer force main that traverses the San Dieguito River. Because of the placement of the flow meter, however, the amount of wash water generated on the Fairgrounds cannot be separated from the other types of sewer flows generated from other public and private areas on-site. During the racing season, horses are washed during specific hours of the morning when other activities on-site are limited. Therefore, assumptions can be made of the amounts of wash water generated during a typical day of the racing season by comparing total sewer flows from the racing season with days that no events take place at the Fairgrounds. It is estimated that approximately 150,000 gallons per day of horse wash water and other process water enters into the sewer system at the Fairgrounds during the Summer Meet and approximately 80,000 gallons per day during the Fall Meet.

## 5 CAFO STORMWATER CALCULATIONS

CAFO requirements mandate that capacity for the 25-year, 24-hour storm event is retained for discharges from all CAFO production areas. Under existing conditions three discharge points discharge runoff from CAFO production areas including: Discharge Point #1 (Backstretch Stable Area), #4 (Barn W Area), and #5 (Barn W Area). Refer to Exhibit 5.0 for locations of the major discharge points. Once the CAFO Stormwater Improvement Project is completed, all CAFO runoff will be directed to the infield lakes and ultimately discharge out Discharge Point # 2 following treatment.

Hydrologic calculations to evaluate surface water runoff associated with the 25-year, 24-hour storm events were performed for the on-site CAFO-related drainage areas that will ultimately drain to the infield lake project. Results of the hydrologic analysis are summarized in the table below. Detailed calculations are provided in Attachment 2.

CAFO Area	Drainage Area	25-Year Peak Flow Rate	25-Year Volume
Backstretch	31.3 ac	21.7 cfs	129,242 ft <sup>3</sup>
Barn W Area	8.8 ac	15.4 cfs	61,642 ft <sup>3</sup>
Total	40.1 ac	37.1 cfs	190,884 ft <sup>3</sup>

In addition to the CAFO drainage areas, several other areas will also be directed to the infield lakes for treatment based on the connectivity with the CAFO drainage areas and the location of the infield lakes. These include the infield drainage area, the turf track, the dirt track and the grandstand tarmac which all currently drain to the lakes under existing conditions.

MS4 Areas	Drainage Area	25-Year Peak Flow Rate	25-Year Volume
Tarmac	4.8 ac	14.6 cfs	50,965 ft <sup>3</sup>
Main Track	13.5 ac	9.6 cfs	55,743 ft <sup>3</sup>
Turf Track	16.5 ac	15.6 cfs	88,245 ft <sup>3</sup>
Infield Area	21.2 ac	11.9 cfs	127,118 ft <sup>3</sup>
Total	56.0 ac	51.7 cfs	322,071 ft <sup>3</sup>

This additional area totals 56 acres and an additional 25-year volume of 322,071 cubic feet. The total drainage area for the CAFO Stormwater Improvement project is 96.1 acres and the total volume that will be collected, retained, and treated is 512,955 cubic feet or 11.8 ac-ft which represents the volume from a 25-year, 24-hour storm event.

The total capacity of the future infield lake system for storage and treatment is 1,315,000 cubic feet. The volume above the normal operating depth is 698,000 cubic feet which leaves a capacity of 617,000 cubic feet available which is more than enough volume to capture and retain the 25-year, 24-hour storm event from the CAFO area and other drainage areas discharging to the infield lakes.

## 5 MORTALITY MANAGEMENT

Any activity involving animals has some associated risk concerning health and welfare of the animals. The Del Mar Fairgrounds prides itself in having safe facilities and highly qualified veterinary staff who are qualified in the diagnosis and treatment of animals on-site. During the race meets, specialized equine veterinarians are on staff that are in tune with the risks and dangers of thoroughbred racing. In addition, veterinarians who specialize in the treatment of farm animals are on staff during the San Diego County Fair and other events involving animals.

Breakdowns are inevitable in high stakes thoroughbred racing. Due to the fragile nature of thoroughbred horses, these injuries are often life threatening, and sometimes require euthanizing to minimize any suffering. These injuries can occur during workouts, racing, or rarely in or near the stable.

This procedure usually involves removing the horse from the track surface with a specialized ambulance, if the breakdown occurs during racing or training. The horse is then brought to the DMTC maintenance barn which is located in the western portion of the backstretch stables area, west of Barn "TT". The horse is placed in a designated area inside the barn which has a rubberized surface and administered an injection which euthanizes the horse. The horse is then removed from the area and loaded into a covered trailer and taken to an off-site facility or other location at the owner's wishes.

During the San Diego County Fair, mortalities on-site are uncommon, with ill animals usually removed immediately from the population. If a sick or injured animal cannot be easily treated on-site, it is taken away from the facility by the owner. If an animal mortality does occur on-site, it is removed immediately by 22<sup>nd</sup> DAA staff or the owner and taken away from the facility. 22<sup>nd</sup> DAA staff also cleans and rinses any pen or stable where a diseased animal was kept. A water and bleach solution is used, and is collected and discharged into the sanitary sewer.

At no point is any dead animal involved in any activity at the Fairgrounds allowed to remain outside exposed to storm water. Although animal mortalities do occur at the Fairgrounds, they never go unseen for very long or have any potential to contaminate surface waters.

## 6 CAFO OPERATIONS AND MAINTENANCE

During the two race meets (summer and fall), the DMTC manages the CAFO operations within the Backstretch and Barn W area. For the County Fair and all other events throughout the year, the 22<sup>nd</sup> DAA is responsible for all Best Management Practice (BMP) inspection and maintenance of the CAFO production areas.

The following sections summarize the operation and maintenance activities for the CAFO production areas.

### 6.1 CAFO PRODUCTION AREAS

PRODUCTION AREA BMP OPERATIONS & MAINTENANCE			
BMP	RESPONSIBLE PARTY	MINIMUM FREQUENCY	ACTIVITY
Stall Cleaning	Race Meets: DMTC  All other times: 22 <sup>nd</sup> DAA	Daily	Occupied stalls shall be inspected cleaned daily at a minimum using dry methods only (e.g. sweeping). The site is to be maintained and monitored daily to ensure that bedding and manure which is removed from stalls is promptly removed and not exposed to runoff.
Temporary Manure Storage	Race Meets: DMTC  All other times: 22 <sup>nd</sup> DAA	Ongoing	All manure is temporarily stockpiled at the end of each barn or designated temporary storage area for removal from site on a daily basis. Sweep any manure storage areas and ensure all materials are confined within temporary storage area.
Manure Hauling & Removal	Race Meets: DMTC  All other times: 22 <sup>nd</sup> DAA	Daily	Remove all temporary manure stockpiles and haul off-site for recycling. Manure piles shall be removed daily.
Clean Hay & Feed Storage	Race Meets: DMTC  All other times: 22 <sup>nd</sup> DAA	Weekly	Sweep any feed, hay, bedding, and CAFO-related equipment storage areas at least once per week and before the start of the wet season to remove solid debris. Clean up spills immediately. Any stockpiles shall be covered when not in use and prior to onset of precipitation. During wet season, clean hay & feed shall be stored indoors.

PRODUCTION AREA BMP OPERATIONS & MAINTENANCE			
BMP	RESPONSIBLE PARTY	MINIMUM FREQUENCY	ACTIVITY
Outdoor Animal Exhibits (Fair only)	22 <sup>nd</sup> DAA	Daily	By the end of each day, animals must be located inside, and all bedding must be collected and properly stored for removal off-site.
Wash Racks	Race Meets: DMTC  All other times: 22 <sup>nd</sup> DAA	Ongoing	Ensure wash water from horse wash racks is diverted to appropriate drain inlet with sewer connection or sewer diversion capabilities, and does not discharge into drainageways. During winter events, only covered, sewer-dedicated wash racks may be used unless backstretch wash rack runoff is diverted to sewer. Sweep wash rack areas frequently and remove any trash & debris.
Sewer Diversions	22 <sup>nd</sup> DAA	Ongoing	Default setting of the pump station is to divert all runoff from the backstretch area to sewer to ensure all wash water is diverted and not discharged to Stevens Creek. In the event of rain event, only first flush runoff will be diverted to sewer.
Mortality Management	Race Meets: DMTC  All other times: 22 <sup>nd</sup> DAA	Ongoing	Verify proper management of mortalities to ensure proper handling and transport off-site, and that mortalities do not come into contact with storm water runoff.
General Housekeeping	Race Meets: DMTC  All other times: 22 <sup>nd</sup> DAA	Ongoing	Litter patrol, violations investigation, reporting and other litter control activities shall be performed within the CAFO production areas in conjunction with maintenance activities.

## 6.2 STRUCTURAL BMP OPERATIONS & MAINTENANCE

In addition to non-structural operations and maintenance BMPs, structural BMPs also exist at the Fairgrounds site that help protect water quality in receiving waters.

STRUCTURAL BMPs			
BMP	RESPONSIBLE PARTY	MINIMUM FREQUENCY	ACTIVITY
Storm Drain Inlets	22 <sup>nd</sup> DAA	Annually	All on-site catch basins and grate inlets within the Backstretch area and other CAFO areas will be cleaned at a minimum of once per year, prior to the start of the wet season.
Infield Lakes	22 <sup>nd</sup> DAA	Ongoing	Water levels within the infield lakes shall be maintained to have sufficient freeboard for storm events. Lake levels will be allowed to drop following the racing season in order to create capacity for winter season rain events. Dependent upon lake levels prior to the start of the wet season, lake levels may be manually lowered through the use of pumping and distribution of water for local irrigation or unused infield areas for percolation to create additional capacity within the lakes. Aerators and biological compounds will continue to be utilized as necessary to minimize algal growth, odor and water quality within the lakes.
Discharge Points	22 <sup>nd</sup> DAA	Monthly	Inspect Discharge Points to ensure no non-storm water discharges are occurring, as well as for the presence of pollutants in storm water runoff.

## 6.3 RECORD-KEEPING REQUIREMENTS

Records of BMP maintenances activities shall be maintained by the 22<sup>nd</sup> DAA for CAFO production areas. The DMTC shall provide the 22<sup>nd</sup> DAA records of CAFO BMP maintenance activities for the summer racing season. Records shall be kept on-site for a minimum of 5 years after creation of record.

Forms that may be used for tracking CAFO-related BMP operations and maintenance are provided as attachments to this report. The following forms are provided in Attachment 3:

- Monthly Summary Reports
  - Ongoing Maintenance Checklist
  - Daily Maintenance Checklist
  - Weekly Maintenance Checklist
- Annual Summary Reports
  - Bi-Annual Maintenance Checklist
  - Annual Maintenance Checklist

Maintenance and recordkeeping requirements for MS4 areas (e.g. parking lots, exhibit halls, recycling areas, etc.) are outlined in the Phase II Storm Water Management Plan (SWMP) prepared for Del Mar Fairgrounds, and therefore are not included in this report.

## 7 EXHIBITS

The exhibits provided in this section are to illustrate the existing site facilities and BMPs described in this report. Drainage flow information for the existing facilities, such as general surface flow lines, drainage conveyances and storm drain facilities are also depicted. All CAFO-related BMPs are shown as well.

**Exhibit 1** Vicinity Map

**Exhibit 2** San Dieguito Watershed Map

**Exhibit 3** FEMA FIRM Panel

**Exhibit 4** Utility Exhibit

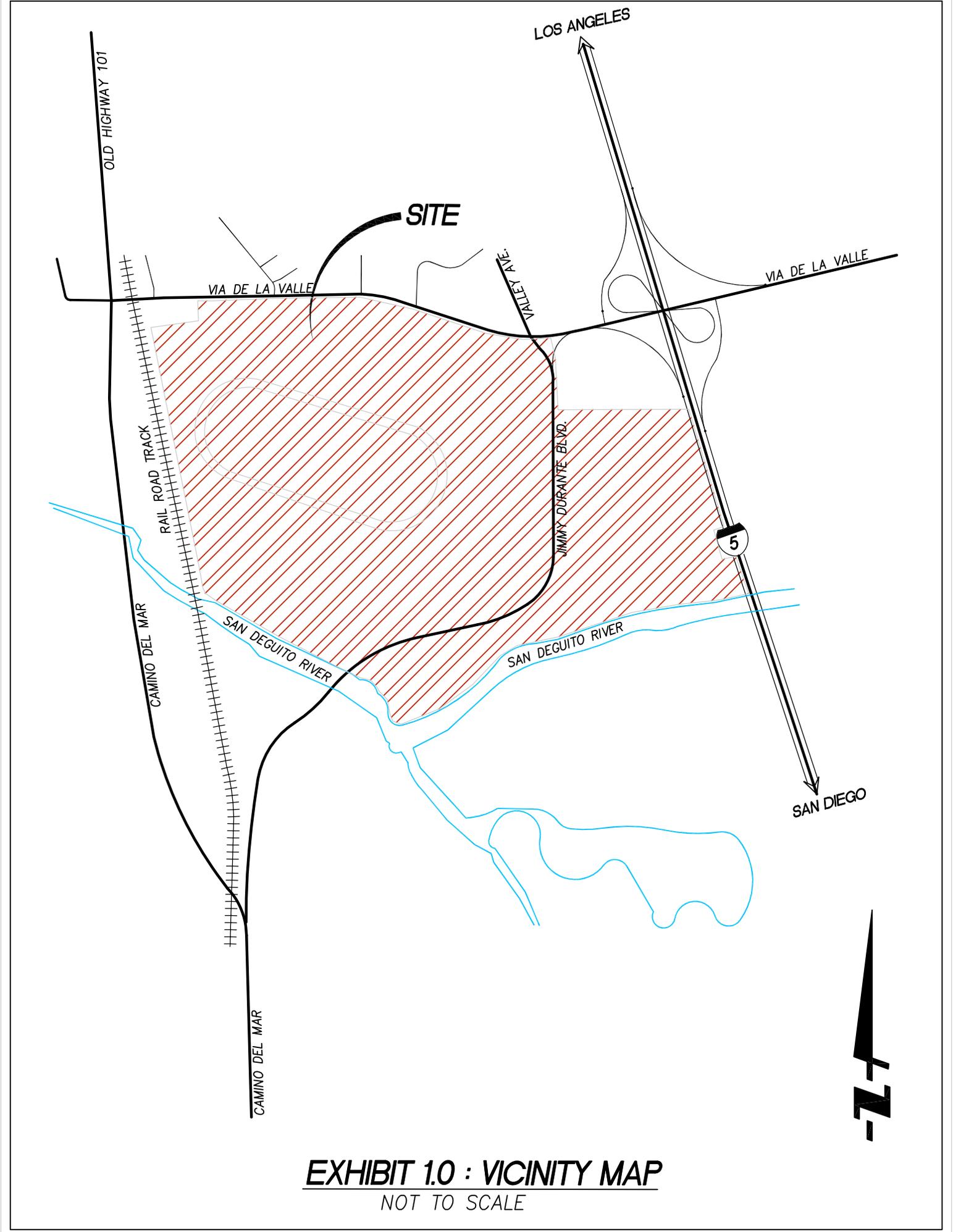
**Exhibit 5** Existing CAFO Areas

**Exhibit 6** Existing Structural BMPs

**Exhibit 7** Manure Management BMPs

Exhibit 8 CAFO Stormwater Improvement Project Plan View

Exhibit 9 CAFO Stormwater Improvement Project Flow Diagram



LOS ANGELES

**SITE**

VIA DE LA VALLE

OLD HIGHWAY 101

VIA DE LA VALLE

VIA DE LA VALLE

RAIL ROAD TRACK

JIMMY DURANTE BLVD.

5

CAMINO DEL MAR

SAN DEGUITO RIVER

SAN DEGUITO RIVER

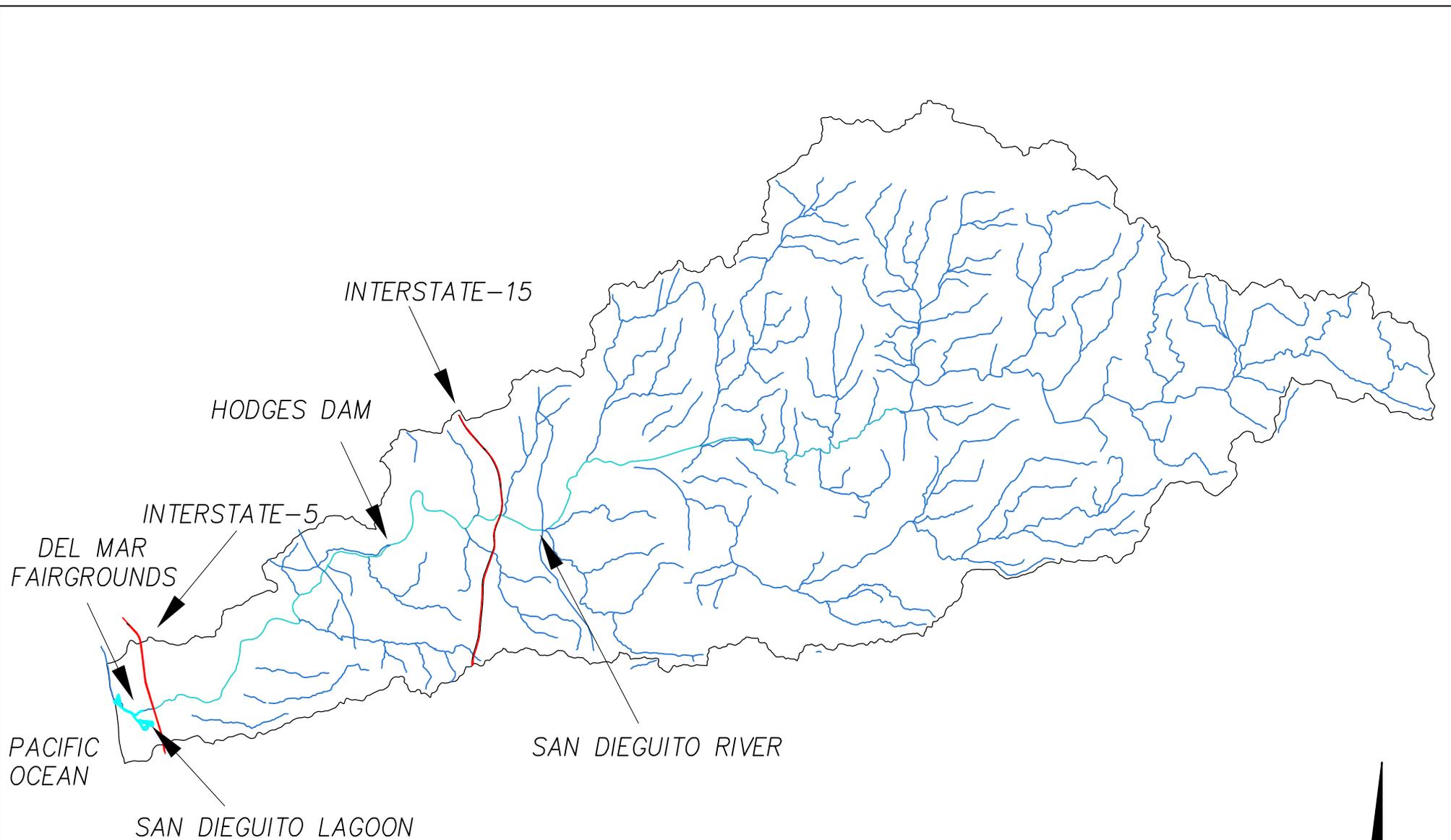
CAMINO DEL MAR

SAN DIEGO



**EXHIBIT 1.0 : VICINITY MAP**

NOT TO SCALE



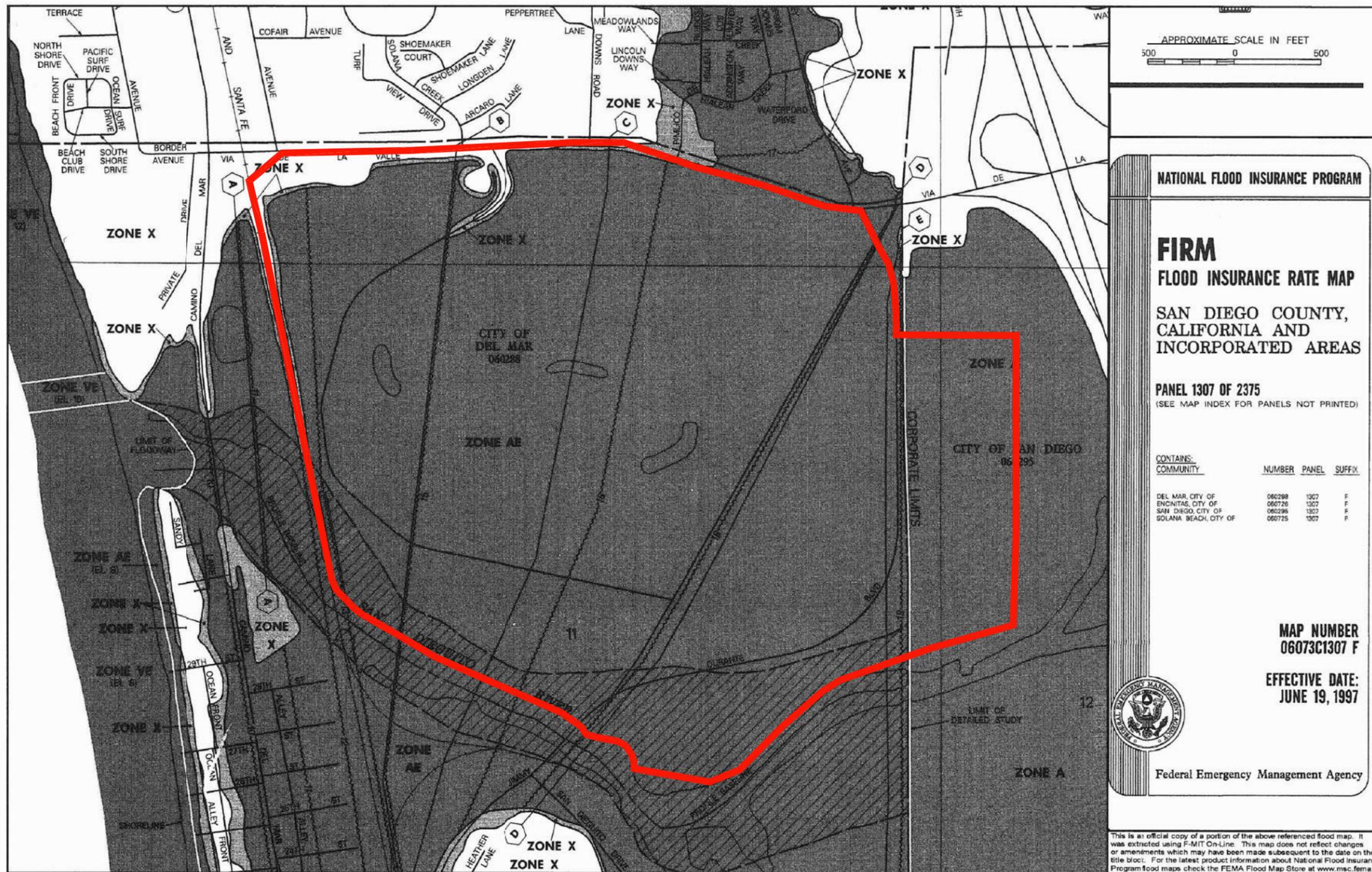
**EXHIBIT 2.0 SAN DIEGUITO WATERSHED MAP**

NOT TO SCALE



# LEGEND

SITE BOUNDARY



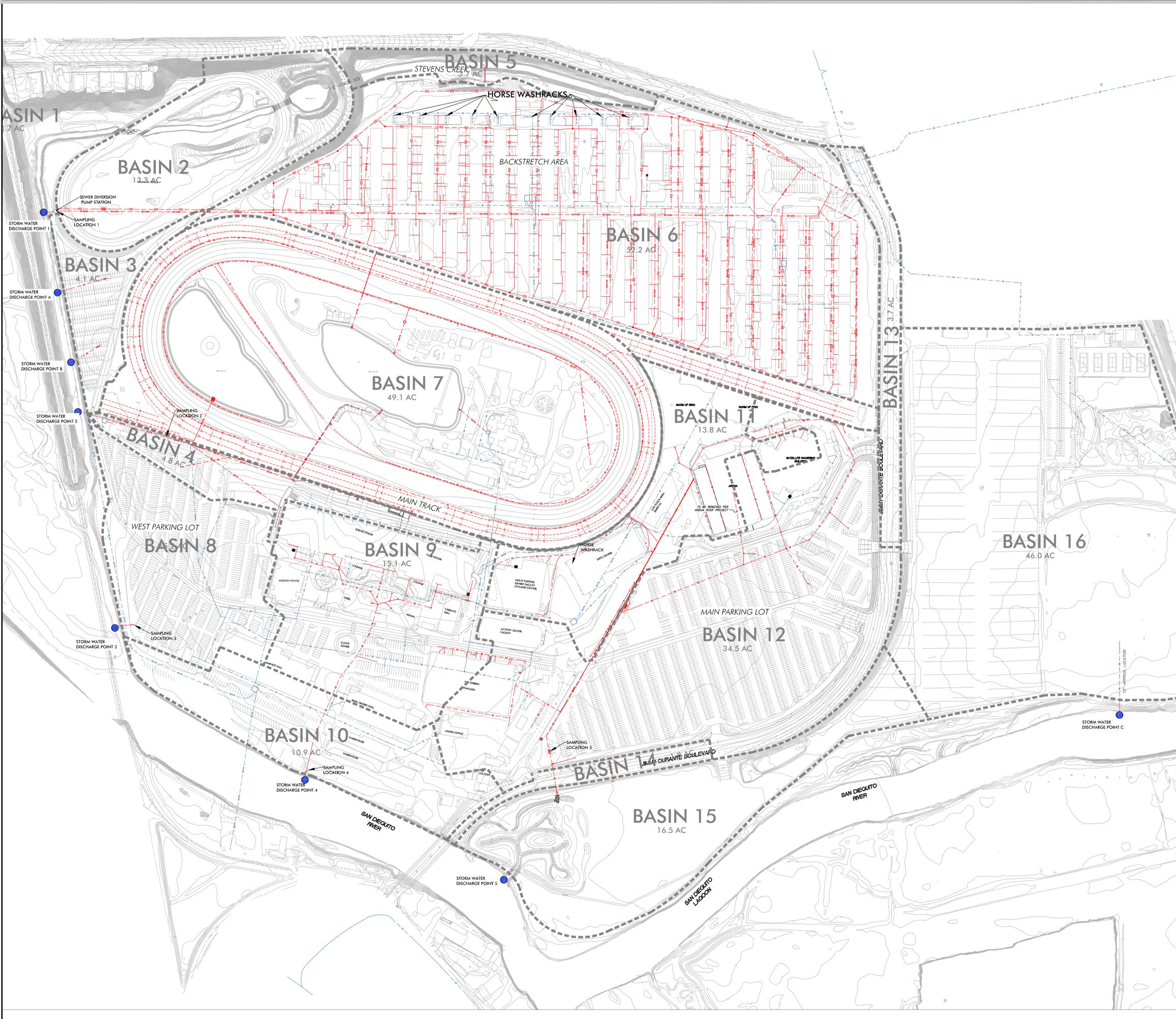
CAFO REPORT OF WASTE DISCHARGE EXHIBIT:

**EXHIBIT 3.0  
DEL MAR FAIRGROUNDS  
FEMA FIRM PANEL**

<b>22nd District Agricultural Association</b>				W.O. NO. ---
DEL MAR, CA				P.T.S. NO. ---
FOR CITY ENGINEER _____ DATE _____				TM/TPM ---
DESCRIPTION	BY	APPROVED	DATE	FILMED
ORIGINAL	FEI			
CONTRACTOR _____ DATE STARTED _____				NAD 83 COORDINATES ---
INSPECTOR _____ DATE COMPLETED _____				LAMBERT COORDINATES ---

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[www.fuscoe.com](http://www.fuscoe.com)

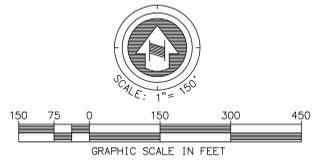


**LEGEND**

- EXIST. STORM DRAIN -- SB
- EXIST. STORM DRAIN FORCE MAIN -- SB/FM
- EXIST. PERF. STORM DRAIN --<
- EXIST. ROOF DRAIN -- RD
- EXIST. STORM DRAIN/WASH WATER -- SD-WASH
- EXIST. FORCE MAIN -- FM
- EXIST. SANITARY SEWER -- SS
- EXIST. SANITARY SEWER FORCE MAIN -- SS/FM
- EXIST. MANHOLE ○
- EXIST. PUMP STATION □
- EXIST. CATCH BASIN ≡
- DISCHARGE POINT ●
- BASIN DRAINAGE BOUNDARY - - - -

**GENERAL NOTES**

1. CAFO PRODUCTION AREAS CONSIST OF ANIMAL CONFINEMENT AREAS, INCLUDING ALL BARN AND STABLES; ANIMAL WASH RACKS, AND STORAGE AREAS CONTAINING MANURE, BEDDING, AND WASTE.
2. CAFO NON-PRODUCTION AREAS CONSIST OF LAND WHICH IS REGULARLY USED BY ANIMALS AND IS NOT USED FOR CONFINEMENT, WASHDOWN, OR WASTE.
3. ANIMAL WASTE IS REMOVED FROM ALL PRODUCTION AND NON-PRODUCTION AREAS REGULARLY, AND IS STORED IN DESIGNATED WASTE STORAGE AREAS.



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CAFO REPORT OF WASTE DISCHARGE EXHIBIT:  
**EXHIBIT 4.0**  
**DEL MAR FAIRGROUNDS**  
**SITE PLAN AND UTILITY EXHIBIT**

22nd District Agricultural Association DEL MAR, CA		W.O. NO. -- P.T.S. NO. --
FOR CITY ENGINEER _____ DATE _____		TM/TPM _____
DESCRIPTION	BY	APPROVED
ORIGINAL	FEI	DATE
		FILMED
CONTRACTOR _____ DATE STARTED _____		
INSPECTOR _____ DATE COMPLETED _____		

**LEGEND**

PHASE II AREAS - 258.6 AC

INDUSTRIAL AREAS - 97.4 AC

AREA DRAINING TO DISCHARGE POINT 1

AREA DRAINING TO DISCHARGE POINT 2

AREA DRAINING TO DISCHARGE POINT 3

AREA DRAINING TO DISCHARGE POINT 4

AREA DRAINING TO DISCHARGE POINT 5

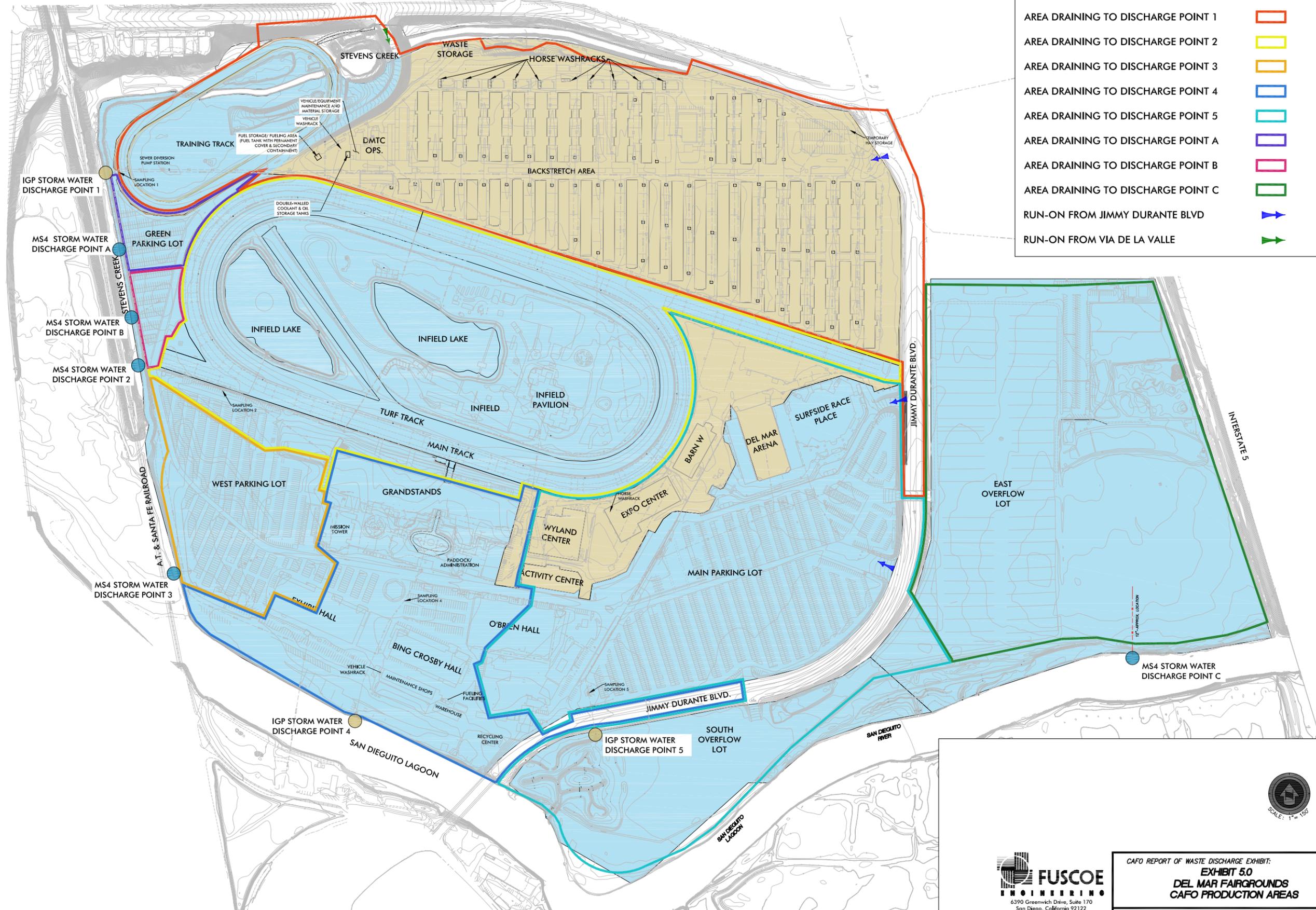
AREA DRAINING TO DISCHARGE POINT A

AREA DRAINING TO DISCHARGE POINT B

AREA DRAINING TO DISCHARGE POINT C

RUN-ON FROM JIMMY DURANTE BLVD

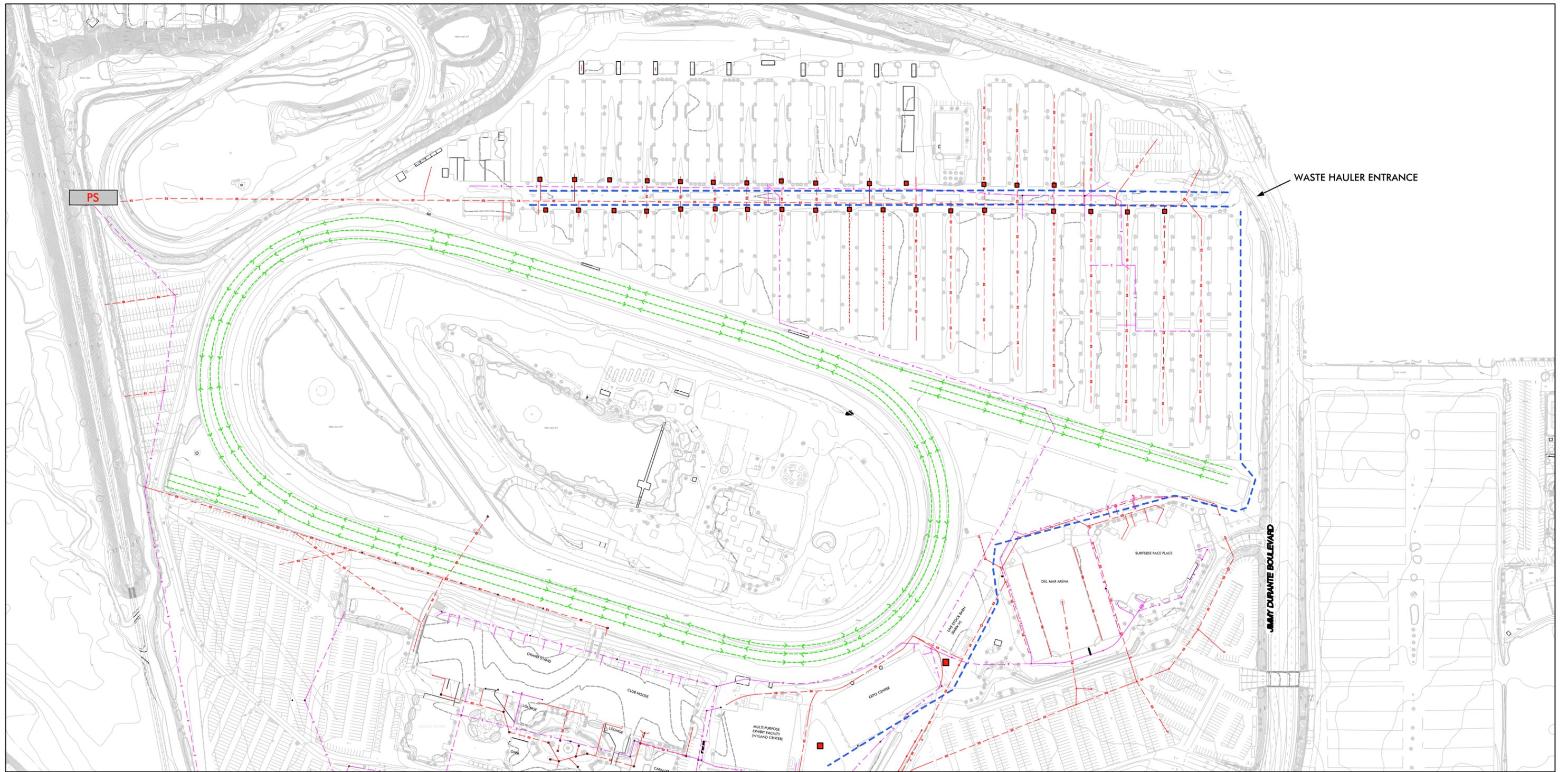
RUN-ON FROM VIA DE LA VALLE



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CAFO REPORT OF WASTE DISCHARGE EXHIBIT:  
**EXHIBIT 5.0**  
**DEL MAR FAIRGROUNDS**  
**CAFO PRODUCTION AREAS**  
 22nd District Agricultural Association  
 DEL MAR, CA





**LEGEND**

MANURE HAULING ROUTE (APPROXIMATE)



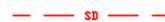
TEMPORARY BEDDING/MANURE PILING AREAS



SEWER DIVERSION PUMP STATION



STORM DRAIN



SEWER



**GENERAL NOTES**

1. MANURE MANAGEMENT BMPS PRIMARILY CONSIST OF DEBRIS/MANURE REMOVAL FROM HORSE STALLS, AND HAULING TO AN OFFSITE RECYCLER. THE WASTE IS RAKED OUT FROM STALLS AND PILED AT THE END OF THE ROW FOR THE HAULER TO LOAD ONTO THE SEMI TRAILER. WASTE IS ONLY PILED FOR A SHORT TIME AND THE WORK IS CONTINUOUS. THE DIVERSION IS ALWAYS SET TO SEWER DURING THE RACING SEASON, THEREFORE NO RUNON OR RUNOFF IS ABLE TO REACH SURFACE WATERS.

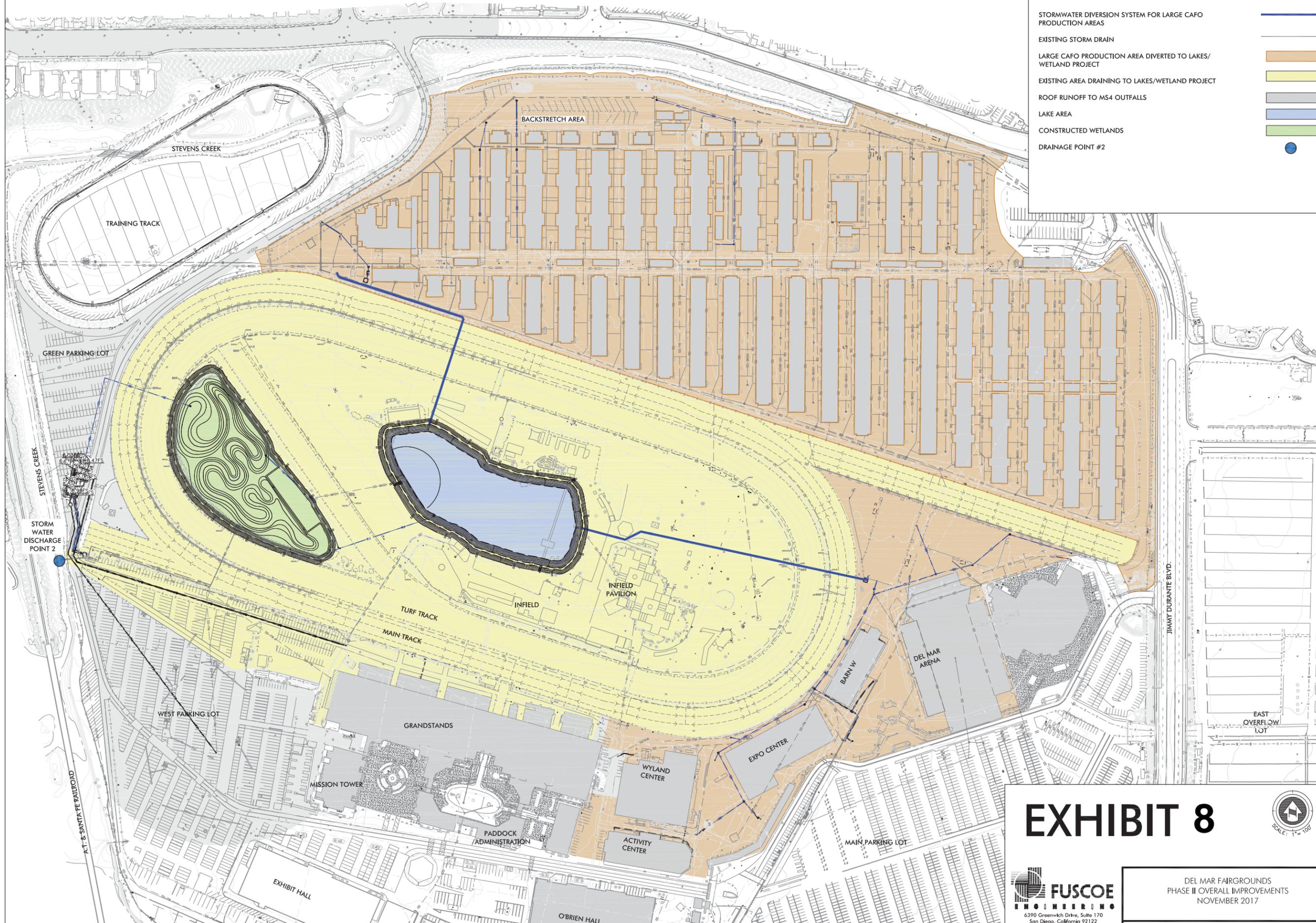


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CAFO REPORT OF WASTE DISCHARGE EXHIBIT:				
<b>EXHIBIT 7.0</b>				
<b>DEL MAR FAIRGROUNDS</b>				
<b>MANURE MANAGEMENT BMPS</b>				
22nd District Agricultural Association DEL MAR, CA				W.O. NO. -- P.T.S. NO. --
FOR CITY ENGINEER _____ DATE _____				TM/TPM --
DESCRIPTION	BY	APPROVED	DATE	FILMED
ORIGINAL	FEI			
				NAD 83 COORDINATES
				LAMBERT COORDINATES
CONTRACTOR INSPECTOR	DATE STARTED		DATE COMPLETED	

**LEGEND**

- STORMWATER DIVERSION SYSTEM FOR LARGE CAFO PRODUCTION AREAS —
- EXISTING STORM DRAIN —
- LARGE CAFO PRODUCTION AREA DIVERTED TO LAKES/WETLAND PROJECT ■
- EXISTING AREA DRAINING TO LAKES/WETLAND PROJECT ■
- ROOF RUNOFF TO MS4 OUTFALLS ■
- LAKE AREA ■
- CONSTRUCTED WETLANDS ■
- DRAINAGE POINT #2 ●



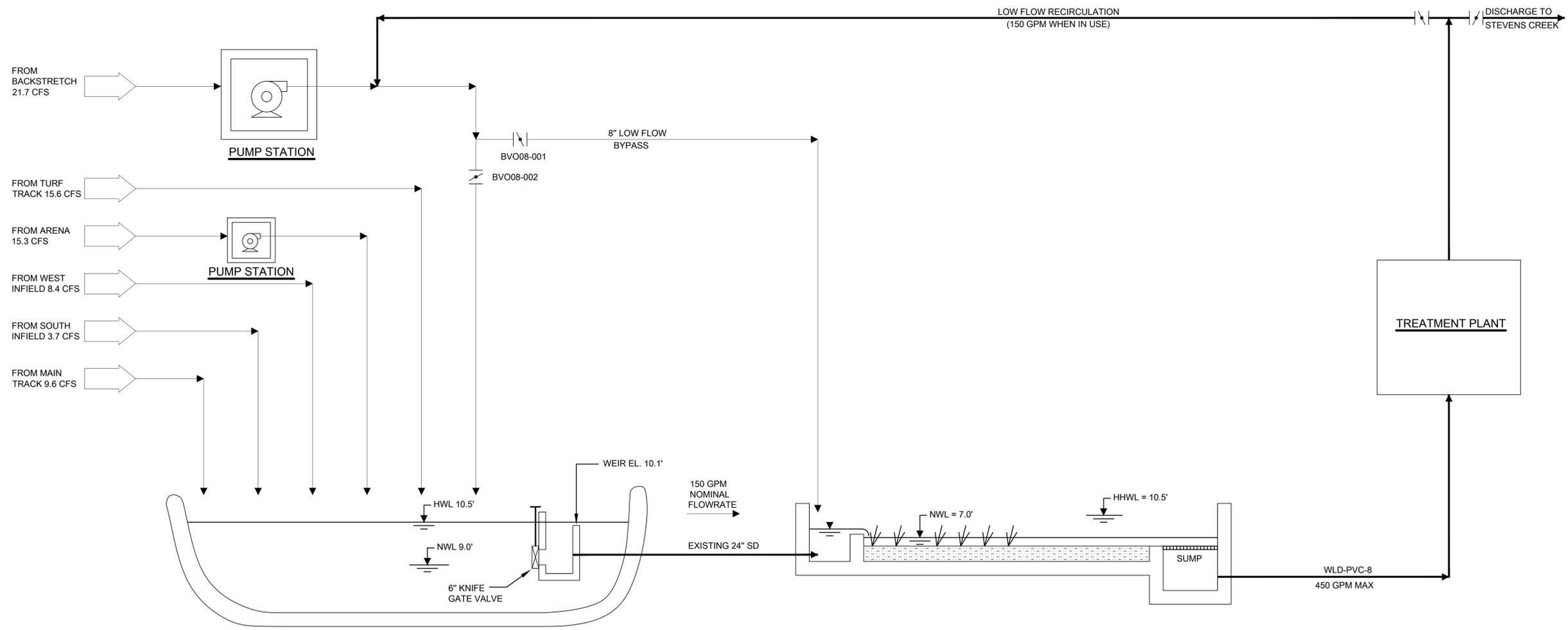
# EXHIBIT 8



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DEL MAR FAIRGROUNDS  
PHASE II OVERALL IMPROVEMENTS  
NOVEMBER 2017

22nd District Agricultural Association  
DEL MAR, CA



**DISCHARGE RECEIVING LAKE**  
 137,000 SF AREA  
 212,000 CF STORAGE

**WETLANDS**  
 71,000 SF AREA  
 404,000 CF STORAGE

# EXHIBIT 9

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DEL MAR FAIRGROUNDS  
 PHASE II OVERALL IMPROVEMENTS  
 NOVEMBER 2017

22nd District Agricultural Association  
 DEL MAR, CA

P:\PROJECTS\2016\08\EXHIBIT 9\20160808\FH20160808\EXHIBIT 9\EXHIBIT 9\W1011

## ATTACHMENTS

Attachment 1 Storm Water Calculations

Attachment 2 Maintenance Checklists

# ATTACHMENT 1

## Stormwater Calculations



Job Name: Del Mar Fairgrounds

Job #: 01632-001-05

Date: 11/30/2017

Infield Lake Treatment System Hydrology Calculations

Description	Total Area (ac)	Pervious Area (ac)	Impervious Area (ac)	% Impervious	C Factor <sup>(1)</sup>	P24 25yr <sup>(2)</sup> (in)	25-Yr Peak Volume (cf)	25-Yr Peak Flow (cfs)
Backstretch	31.3	31.3	0.0	0.00	0.35	3.25	129,242	21.7
Main Track	13.5	13.5	0.0	0.00	0.35	3.25	55,743	9.6
Turf Track	16.5	13.4	3.1	0.19	0.45	3.25	88,245	15.6
Infield Area	21.2	15.1	6.1	0.29	0.51	3.25	127,118	11.9
Arena	8.8	4.9	3.9	0.44	0.59	3.25	61,642	15.4
Tarmac	4.8	0.0	4.8	1.00	0.90	3.25	50,965	14.6
<b>TOTALS</b>	<b>96.1</b>	<b>78.2</b>	<b>17.9</b>	<b>0.19</b>			<b>512,955</b>	<b>88.8</b>

Notes:

1) From  $C = 0.90 \times (\% \text{Impervious}) + C_p \times (1 - \% \text{Impervious})$  per SDCHM June 2003

2) From Appendix B of SDCHM June 2003, 24 Hours Rainfall Isopluvials

## ATTACHMENT 2

### Maintenance Checklists

## ATTACHMENT 3

### MAINTENANCE CHECKLISTS

The following maintenance checklists and associated Nutrient Management Plan (NMP) have been developed to ensure CAFO compliance within Del Mar Fairgrounds. These checklists are to be used as part of a Nutrient Management Program at Del Mar Fairgrounds. Monthly and annual maintenance reports are to be completed by the Facility Manager. All supplemental or supporting information, such as invoices and forms are to be attached to the reports.

The following checklists are included:

- 1 MONTHLY MAINTENANCE REPORT FORM
- 2 ANNUAL MAINTENANCE REPORT FORM

**SECTION 1 – MONTHLY MAINTENANCE REPORT FORM**

---

## MONTHLY MAINTENANCE REPORT

Report Month: \_\_\_\_\_

Inspector Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Organization: \_\_\_\_\_

Date: \_\_\_\_\_

INSTRUCTIONS: Please check all that apply. For those items left unchecked, provide an explanation or corrective action in the notes section of the report. Attach operations and maintenance records, if any, to each monthly maintenance report.

### MAINTENANCE FREQUENCY: ON-GOING

---

	CHECK
<u>Temporary Manure Storage</u>	
Stockpile manure in DESIGNATED AREAS ONLY for daily waste hauler pick-up.	<input type="checkbox"/>
Manure stockpiles not exposed for more than 24 hours. Cover and berm stockpiles at end of day if not hauled away.	<input type="checkbox"/>
Dry sweep manure storage areas. DO NOT WASH DOWN*.	<input type="checkbox"/>
<hr/>	
<u>Wash Racks</u>	
Washwaters drain to sewer/sewer diversion.	<input type="checkbox"/>
Prohibit use of UNCOVERED wash racks with no sewer connection during rainy months (October 1 - May 1).	<input type="checkbox"/>
Sweep wash rack area and keep free of trash and debris.	<input type="checkbox"/>
<hr/>	
<u>Sewer Diversions</u>	
Sewer Diversion at Discharge Point #1 is operational. In the event of rain, diversion is by-passed after 0.2 inches of precipitation.	<input type="checkbox"/>
Sewer and storm drain inlets (8) north of Surfside Race Place are manually capped during rain events.	<input type="checkbox"/>

*Continues on next page*

DEL MAR FAIRGROUNDS  
NUTRIENT MANAGEMENT PLAN

---

Trash Storage

- Trash containers/dumpsters are covered or have lids to prevent contact with precipitation.
- Trash containers/dumpsters are leak proof.
- Trash storage areas are situated away from roof drainage and surrounding area drains away from the area.
- Prohibit manure or CAFO wastes from being disposed in trash containers/dumpsters.
- 

Racetrack and Training Track

- Removed manure and trash upon sight.
- Temporarily store manure in moveable bins with lids/covers or as stockpiles in DESIGNATED AREAS ONLY for hauling.
- Do not mix manure and trash/debris.
- 

Infield Lakes

- Check water levels to ensure adequate volume for rain water storage.
- Ensure lake water is kept clean with aerators and biological compounds.

Enter lake level at the time of this report \_\_\_\_\_

---

General Housekeeping

- Dispose of trash and litter in appropriate trash receptacles/dumpsters.
- Patrol Fairgrounds property for improper disposal of litter. Report violations, if any.
- Attach investigation reports, if any, to this monthly report (check box if none).
- 

*Continues on next page*

*\* Power washing is only permitted if all wash water is collected and disposed of properly (to sewer).*

MAINTENANCE FREQUENCY: DAILY

---

	CHECK
<u>Manure Hauling and Removal</u>	
Remove all temporary manure stockpiles daily.	<input type="checkbox"/>
Haul off-site for recycling using designated haul routes.	<input type="checkbox"/>
Attach hauling records to monthly report.	<input type="checkbox"/>

Enter amount of manure/litter transferred (in tons) for this month \_\_\_\_\_

---

<u>Horse Stall Cleaning</u>	
Clean stalls using dry methods* (e.g. sweeping).	<input type="checkbox"/>
Remove bedding and manure promptly from stalls and stockpile at DESIGNATED AREAS ONLY for hauling away.	<input type="checkbox"/>

---

<u>Walkways and Corrals</u>	
Clean and sweep walkways, corrals, and paddocks to properly remove any manure and trash.	<input type="checkbox"/>
Follow General Housekeeping BMP practices.	<input type="checkbox"/>

---

<u>Outdoor Animal Exhibits (San Diego Fair Months Only; June - July)</u>	
Move animals indoors at the end of each day.	<input type="checkbox"/>
Collect bedding and stockpile at DESIGNATED AREAS ONLY for hauling at the end of each day.	<input type="checkbox"/>

---

*Continues on next page*

\* Power washing is only permitted if all wash water is collected and disposed of properly (to sewer).

DEL MAR FAIRGROUNDS  
NUTRIENT MANAGEMENT PLAN

---

MAINTENANCE FREQUENCY: WEEKLY

---

	CHECK
<u>Clean Hay and Feed Storage</u>	
Store hay and feed indoors during rainy months (October 1 – May 1)	<input type="checkbox"/>
Cover hay and feed stockpiles when not in use.	<input type="checkbox"/>
Keep hay and feed stockpiles in DESIGNATED STORAGE AREAS ONLY and keep areas clean.	<input type="checkbox"/>

---

MAINTENANCE FREQUENCY: MONTHLY

---

	CHECK
<u>Storm Water Discharge Points</u>	
Inspect monthly for detection of unauthorized non-storm water discharges.	<input type="checkbox"/>
Report illegal discharges, if any.	<input type="checkbox"/>
Attach investigation reports, if any, to this monthly report (check box if none).	<input type="checkbox"/>

---

Supplemental information & notes (indicate which activity required additional information):

---

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*ATTACH INSPECTION RECORDS HERE*

*ATTACH MANURE HAULING RECORDS / MANIFESTS HERE*

**SECTION 2 – ANNUAL MAINTENANCE REPORT FORM**

---

## ANNUAL MAINTENANCE REPORT

Report Month: \_\_\_\_\_

Inspector Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Organization: \_\_\_\_\_

Date: \_\_\_\_\_

INSTRUCTIONS: Please check all that apply. For those items left unchecked, provide an explanation or corrective action in the notes section of the report. Attach operations and maintenance records, if any, to each annual maintenance report.

### MAINTENANCE FREQUENCY: BI-ANNUALLY

---

	CHECK
<b><u>Berms and Buffer Areas</u></b>	
No grading or erosion has occurred in berm north of Stable Area.	<input type="checkbox"/>
All fencing is intact. Repair as necessary.	<input type="checkbox"/>
Erosion rills/breaks are stabilized with erosion controls or re-graded, as necessary (check box if none).	<input type="checkbox"/>
<b><u>Clarifier Units</u></b>	
Inspect and clean 2x per year.	<input type="checkbox"/>
Properly dispose of clean-out material. DO NOT dispose of in storm drain.	<input type="checkbox"/>
Clarifier units are operational.	<input type="checkbox"/>
Attach cleaning logs/reports/invoices to this report.	<input type="checkbox"/>

---

*Continues on next page*



ATTACH CLEANING AND/OR MAINTENANCE LOGS,  
RECORDS, AND/OR INVOICES HERE