



©22nd D.A.A.

22ND DISTRICT AGRICULTURAL ASSOCIATION
State of California

December 13, 2010

Mr. David Gibson, Executive Director
Regional Water Quality Control Board
9174 Sky Park Ct # 100
San Diego, CA 92123-4353

Re: 22nd District Agricultural Association / Del Mar Fairgrounds Comments on Proposed Tentative Order R9-2010-0124 General Waste Discharge Requirements Associated with The Public Display of Fireworks to Surface Waters Within The San Diego Region

Dear Mr. Gibson:

On behalf of the 22nd District Agricultural Association / Del Mar Fairgrounds, thank you for the opportunity to comment on proposed Tentative Order R9-2010-0124 regarding the public display of fireworks. The Del Mar Fairgrounds conducts only a single fireworks display on the Fourth of July every year during the San Diego County Fair, which is held every summer and draws over one million visitors annually. The Del Mar Fairground's annual Fourth of July fireworks display has been held continuously for over 62 years. We are concerned that the Tentative Order threatens to end an important tradition thrilling thousands of San Diego County citizens every year.

The Del Mar Fairgrounds is unaware of any evidence that its annual show has caused any degradation in water quality. The fireworks display does not occur over a surface water body regulated by the Regional Board. In fact, the nearest water bodies regulated by the Regional Board are more than 1,000 feet away, exceeding the 'fall out range' of any debris.¹

Nonetheless, the extensive permitting, monitoring and BMPs proposed in the Tentative Order has the potential to make the economics of the Del Mar Fairgrounds' single annual fireworks display cost-prohibitive. We are advised that several people have estimated the water and sediment monitoring alone could cost between \$30,000 and \$100,000 per event, depending on the amount of testing required. Because the Del Mar Fairgrounds' annual fireworks display costs approximately \$25,000, the proposed Order's Requirements have the potential to at least double the cost.

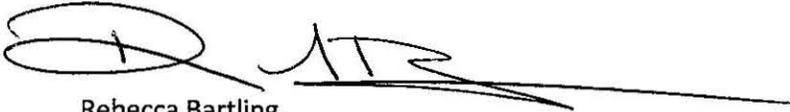
¹ Although there are two small inland lakes at the Del Mar Fairgrounds, it is our understanding these are not regulated by the Regional Board.

Mr. David Gibson, Executive Director
Regional Water Quality Control Board
December 13, 2010

We respectfully request that the Regional Board reconsider Tentative Order R9-2010-0124 in light of this information or, alternatively, amend the tentative order to exempt entities hosting only one or two annual fireworks displays conducted by licensed professionals.

Sincerely yours,

22nd District Agricultural Association

A handwritten signature in black ink, appearing to read 'Rebecca Bartling', with a long horizontal line extending to the right.

Rebecca Bartling,
COO/Deputy General Manager, 22nd DAA