September 7, 2018

San Diego County Regional Airport Authority
Attention: Ted Anasis
P.O. Box 82776
San Diego, CA 92138-2776

Dear Mr. Anasis:

SUBJECT: AIRPORT DEVELOPMENT PLAN – DRAFT ENVIRONMENTAL IMPACT REPORT

MTS appreciates the opportunity to comment on the July 2018 Draft Environmental Impact Report (DEIR) for the Airport Development Plan (ADP), prepared for San Diego County Regional Airport Authority (SDCRAA). Our comments are provided below.

MTS has two primary interests in San Diego International Airport (SDIA) development and its impacts:

1) increasing transit ridership among airport users. MTS Route 992 is the current route that offers frequent service between Downtown San Diego and SDIA (every 15 minutes, seven days a week), and currently carries approximately 1,200 passengers per day.

2) improving mobility and reducing congestion around SDIA. MTS operates significant transit service near the airport, which is impacted by airport-related traffic congestion. MTS Bus Routes 923 and 992 utilize Harbor Drive, and a dozen MTS bus routes serve the western portion of Downtown, which borders the airport along Laurel Street.

Transit recommendations in the DEIR for mitigating ADP project impacts are similar to or the same as those found in most SDCRAA project plans and studies over the past twelve years, including the Airport Master Plan, the 2008 Airport Transit Plan, the 2016 Airport Transit Plan, Destination Lindbergh, the Terminal 2 Parking Plaza, and the Northside improvements. Unfortunately, similar to previous airport projects, the DEIR considers most of these infeasible or not fully feasible because they rely on other agencies to implement and/or the airport cannot fund off-site improvements.
Section 3.14 of the DEIR, Traffic and Circulation, recommends that the mitigation measures listed below (MM-TDM-1) be implemented to alleviate traffic impacts of the ADP. We have addressed each here:

1. Increase the use of transit using the Palm Street Light Rail Station (LRT):

   This recommendation was also used by the airport most recently as mitigation for the Terminal 2 Parking Plaza project. Unfortunately the implementation was not successful for many reasons:
   a. No wayfinding signage was installed to direct airport-bound travelers to the airport bus shelter, nor for Trolley-bound passengers from the drop-off bus stop. Temporary “feathers” installed to mark the path lasted only a few weeks and were never replaced. The airport’s bus shelter is difficult for first-time travelers to locate, as it isn’t visible from the Trolley station and is actually over 200’ north of Palm Street.
   b. The environment along Palm Street is not attractive or well maintained. It is frequently littered with trash, weeds, and graffiti. This adds to the disorientation felt by travelers who expect a well-marked and maintained path between the two modes.
   c. Trolley riders are only served by the airport parking buses, not the larger and more frequent car rental buses that travel along the same path. Passengers report confusion when waiting in the designated bus stop location and watching certain airport buses pass them by.
   d. The area surrounding the on-airport bus shelter near Palm Street is extremely dark at night and does not feel secure for travelers. The lack of street activity and few “eyes on the street” lead to a sense of vulnerability.

If this is to be successful, it will require a greater effort and longer-term commitment by SDIA to address these issues above.

2. Upgrade MTS Bus Route 992 to Bus Rapid Transit (BRT) service:

   MTS recently increased Route 992 service to operate a 15-minute frequency, seven days a week. It already had among the longest spans of all MTS bus routes. This change alone has increased ridership by over ten percent this year. Frequency and span could be further improved if the airport were to provide resources to do so. Nearly all of Route 992’s ridership is bound to or from the airport (it serves no other destination outside of Downtown), so it would seem reasonable for the airport to financially support service in the same way it subsidizes other transportation - building airport roadways, etc.

Simply rebranding Route 992 buses as Rapid and removing a small number of intermediate bus stop pairs would do little to increase transit mode share to the airport. A conversion of a route to MTS’ “Rapid” network requires not only consolidation of stops and enhanced levels of service, but also infrastructure such as exclusive bus lanes, signal priority, and enhanced bus stop amenities. None of these are proposed in the ADP, even those that could be done on airport property. MTS would especially encourage exclusive transit lanes in the very congested airport terminal areas and along eastbound Harbor Drive, which does not have any capacity improvements proposed.

3. Partner with transit operators to consider a transit line to the Old Town Transit Center and Amtrak Station to SDIA:

   As a transit hub for the northern and western parts of the MTS service area, the Old Town Transit Center (OTTC) is ideally located for airport feeder service. MTS concurs that a bus route between the OTTC and the airport would be very useful in furthering the goal of reducing traffic around the
airport. MTS would work with SDIA to accommodate the route within the OTTC facility, whether operated by MTS or SDIA. However, it is unclear to MTS why the airport would not or could not finance this service, which would cater solely to airport users. A remaining issue for consideration is how to prevent airport users from occupying all of the OTTC parking, which is reserved for transit riders and State Park visitors.

4. Implement TDM parking strategies:

This has a high potential to be successful if implemented in a meaningful way. Financial incentives to use transportation alternatives and disincentives for parking could be a powerful tool, and MTS encourages SDIA to expand on specific measures it would take under development of the ADP. However, the addition of a five-story, 7,500 space parking structure at Terminal 1 contradicts the incentive to reduce parking at the airport.

5. Increased partnership with Transportation Network Companies (TNC):

Impacts of TNCs on traffic congestion and emissions are similar and possibly worse than those of private vehicles or those parking due to the inherent deadhead travel required. In line with the Section 2.4 goal of providing a plan that is environmentally sustainable, SDIA should focus on reducing TNC mode share to the airport, which is well served by shared ride options such as transit and shuttles.

MTS makes the following recommendations for traffic and air quality mitigations for the Final Environmental Impact Report (FEIR):

1) Improvements to Harbor Drive and the airport roadway network should designate a dedicated right-of-way for a future fixed guideway system between Downtown San Diego and the airport. This could be ultimately be bus rapid transit, rail, or other mode, so the right-of-way should be of sufficient size and design to accommodate different types of transit. The integration of this right-of-way into the terminal facilities to maximize usage can be coordinated with MTS. We anticipate that such a project could have a variety of potential funding sources, SDIA among them at least for infrastructure on airport property.

2) Airport funding should be allocated towards improved transit access to the airport, to include enhanced frequency and span on existing services, a new route connecting to Old Town Transit Center, and the ultimate operation of a fixed-guideway service. This investment into increased transit service could help negate the need for constructing the new 7,500 space parking structure, which will increase traffic congestion on Harbor Drive.

3) The Intermodal Transit Center (ITC), proposed for the area near Interstate 5 and Washington Street, should not be considered for mitigation of traffic impacts caused by the ADP because it is unfunded. However, airport improvements should also be designed to complement and not preclude the future construction of the ITC. If the Airport intends to contribute to the ITC eventually being built, the EIR should provide detail as to what that ITC would entail, including what improvements would be made as part of this project on airport property to accommodate the ITC.
4) TDM measures should specify financial incentives and disincentives for airport/airline employees and travelers. The EIR should include detailed plans for how the Airport will increase transit usage by airport employees in particular. These plans could include subsidized transit fares, promoting employee vanpooling (especially for early morning and late night shifts), improving first mile/last mile options for employees using transit, improving conditions for biking to the airport, or employee shuttles from OTTC.

As with previous project plans and environmental reports submitted by SDIA, many of the suggested mitigations rely on the actions and budgets of other agencies, including MTS. The result has been SDIA projects have been constructed without meaningful mitigation, therefore actually increasing congestion. MTS recommends that the FEIR for this SDIA project identify mitigation measures that SDCRAA has the ability and will to implement itself. Further, that SDCRAA take a proactive stance with the Federal Aviation Administration in establishing that the recommended measures above meet their required criteria of benefitting airport travelers so that airport funds can be used to offset airport impacts.

Sincerely,

[Signature]
Paul C. Jablonski
Chief Executive Officer

cc: Aimee Faucett Chief of Staff, Office of Mayor Kevin Faulconer, City of San Diego
    Kris Michell, Chief Operating Officer, City of San Diego
    Kim Kawada, Chief Deputy Executive Director, San Diego Association of Governments
    Cory Binns, District Director, District 11, California Department of Transportation
    Randa Coniglio, Chief Executive Officer/President, Port of San Diego
    Marko Medved, Director, Department of General Services, County of San Diego
    Helen Robbins-Meyer, Chief Administrative Officer, County of San Diego
    Sharon Cooney, Chief of Staff, MTS
    Denis Desmond, Director of Planning, MTS