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August 28, 2018

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

**Subject: Airport Development Plan DEIR – SCH NO. 2017011053**

Dear Mr. Anasis:

On behalf of Circulate San Diego, whose mission is to create excellent mobility choices and vibrant, healthy neighborhoods, I am writing with comments on the San Diego International Airport Development Plan Environmental Impact Report (EIR). We recommend that the EIR be re-circulated after including additional transportation alternatives to reduce traffic and improve transit connections.

The Airport is a key transportation hub, and is vital to our local economy. Since the Airport is located conveniently in the urban core, transportation planning should ensure the success of mobility options for Downtown and the surrounding neighborhoods. The Airport Authority proposes improvements that largely focus on car traffic instead of improvements to public transportation options to airport terminals. The draft EIR effectively only makes proposals that help alleviate traffic on Harbor Drive, but does not address the larger issue of connectivity. The EIR does not analyze meaningful or sufficient transportation alternatives that would reduce emissions and traffic. Additionally, the draft EIR does little to analyze transportation alternatives to address outbound traffic on Harbor Drive and the surrounding roadways.

In 2015 the California Coastal Commission approved with special conditions the construction of a three-story parking garage with 1,753 new parking spaces.<sup>1</sup> The special conditions for the approval of the vehicle capacity-increasing parking garage included the need to implement a Public Transit Outreach Program with prominent links to transit options on the Airport website, in-airport advertising of transit options, and coordination with other agencies to inform transit riders of the available connections to the Airport. It also required an Annual Progress Report on Public Transit Improvements. Future approval of the Airport Development Plan requires Coastal Commission review, and more analysis of transit connections is needed to meet the intent of the Coastal Commission's previous special conditions on the Airport.

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<sup>1</sup> California Coastal Commission, Addendum to Item TH24a (August 11, 2015), available at <https://documents.coastal.ca.gov/reports/2015/8/th24a-8-2015.pdf>.

Circulate supports the Airport's goals to reduce greenhouse gas emissions but there must be an analysis of more effective, realistic, and creative transportation alternatives. Further, it is important to recognize that different forms of ground transportation have merit and future transportation infrastructure needs of passengers and employees should be given strong consideration and accommodated. Circulate suggests the following alternatives be incorporated and analyzed in the EIR to accommodate future airport transportation needs:

- Planning to accommodate future construction of a meaningful rail connection to the airport.
- A people-mover on airport property to connect airport customers and employees to transportation options, including a spur that runs off-airport property to the Middletown, Washington Street, and/or Old Town trolley stations.
- Dedicated transit right-of-way up Harbor Drive for the 992 bus and/or other transit connections.
- A robust ride-share solution that is convenient for airport customers and drivers.
- Reduction in proposed new parking facilities, accounting for decreasing demand caused by the advent of ride-share, transit use, and the future of autonomous vehicles.

The Airport has an important obligation with this EIR to affirmatively consider alternative transportation solutions for the airport, especially through public transit. Better transit and more transportation choices for the Airport will spur economic growth for the entire region.

The Airport should work collaboratively with relevant public agencies like MTS, SANDAG, the Port of San Diego, and the City of San Diego to improve transportation connections and optimize public transit, including a rail connection, to the airport. This is especially important given the new leadership and governance structures at both MTS and SANDAG. MTS is currently considering a new transit-focused ballot measure, and SANDAG is currently updating its Regional Plan. The Airport has a new opportunity to work with local agencies to identify future funding to expand transit access for both Airport customers and employees.

Sincerely,



Colin Parent  
Executive Director and General Counsel