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September 24, 2015

Ms. Martha Blake
Environmental Planner
City of San Diego
Development Services Department
1222 First Avenue, MS 501
San Diego, CA 92101

Via e-mail at: DSDEAS@san Diego.gov

**SUBJECT: DRAFT ENVIRONMENTAL IMPACT REPORT COMMENTS ON THE
STADIUM RECONSTRUCTION PROJECT (PROJECT NO. 437916)**

Dear Ms. Blake:

Thank you for the opportunity to review the August 2015 Draft Environmental Impact Report (DEIR) for the Stadium Reconstruction Project. MTS has been pleased to serve events at the proposed project's site for the past 18 years. Our significant structural investment in this stadium site, with a large light rail station, overhead guideway, and storage tracks designed to accommodate heavy passenger loads during special events, has made it possible to add service capacity to meet the demands of any event. We applaud the City for choosing a site for the new stadium that will continue to make transit the best choice for transportation to and from special events.

MTS has the following minor comments on the DEIR:

Figure 3-2, New Stadium Site Plan:

The current stadium gate is approximately 250' from the Green Line Trolley station. The proposed new stadium appears to be approximately 1,200' from the Trolley station. MTS does not perceive the added distance from the station as a negative. While the distance is farther, it allows for additional passenger queuing space for very large events. More importantly, the added distance would enable other more intensive transit-oriented residential and commercial uses to be developed closer to the Trolley station should the City pursue further development of the site.

Page 3-9, Parking Lot:

The current stadium parking lot is open and available to 'park-and-ride' on the Green Line at no cost to transit users when there are no major events at the stadium. It is unclear whether this use would continue to be permitted. MTS would encourage and support continued use of the stadium parking lot for transit parking during these times.



Page 3-19, Transit Opportunities, Page 4.10-15, Bus, and Page 4.10-28, Transit Trips:

The nearest bus services are Route 14 on Rancho Mission Road (weekdays only, hourly) as mentioned, and Route 18 on Camino del Rio North (weekdays only, every 30 minutes). Both routes are operated with small minibuses and have limited frequency and capacity. Neither would likely be considered candidates for event access, given their limited operation and distance to the stadium.

Page 3-21, Qualcomm Stadium Demolition and Page 4.6-37 (HAZ-8):

We ask that the City's contractor be required to work closely with MTS to ensure that implosion and other demolition activities do not negatively affect rail infrastructure and to mitigate impacts on Trolley operations. Demolition is expected to occur for 12-14 months, simultaneous to on-going events at the new stadium, and we again ask that the contractor be required to work with MTS to accommodate safe pedestrian movements from the station to the new stadium during that time.

The Green Line is a critical transit mobility link through Mission Valley, connecting Downtown, bus service to coastal and northern communities, San Diego State University, and East County. Shutting down the Green Line viaduct for extended periods of time for Project related activities would create a detrimental gap in transit service. Therefore, any such shutdown should be a measure of last resort, extremely limited in duration, during off peak service times, and only after consultation and agreement with MTS. Our MTS Rail Operations and Right-of-Way engineers would coordinate closely with the City in advance on any approved closures. Please note that MTS would need to provide bus bridges to accommodate passengers if this occurs during hours of revenue service. Project costs should include reimbursement to MTS for this expense, which MTS can help the project team estimate.

Page 4.9-34, Public Transit:

MTS has had informal discussions with the City regarding the viability of a pedestrian bridge over the San Diego River linking Mission City Parkway with the Fenton Parkway Trolley Station. Such a bridge would increase the "walkshed" of the Trolley station, located one station away from the stadium site on the Green Line. This could create opportunities to utilize on-street and private parking capacity on the south side of the river to 'park-and-ride' via the Green Line. This would also enhance bicycle and pedestrian access to the project site. This connection is shown as existing infrastructure in Figure 4.10-4.

Page 4.10-13, Figure 4.10-2, Existing Transit:

This exhibit should be updated with the following changes: Bus Route 830 has been discontinued, Route 210 was renumbered to Route 110 and no longer operates on I-15, and Route 960 was renumbered to Route 60. Route 870 is now a regular Express bus (not Premium Express). Note that Express Routes 60 and 870 pass the project site on the freeway, but have no nearby stops.

Page 4.10-16, Figure 4.10-3, Regional Transit:

This exhibit should be updated with the following changes: The Green Line is extended south

from Old Town to 12th & Imperial Transit Center while the Blue and Orange Lines end in Downtown, at America Plaza and Santa Fe Depot respectively.

Page 4.10-17, Class I Bike Paths:

Qualcomm Way is listed as having a Class I bike path instead of the existing Class II bike lanes.

Page 4.10-19, Figure 4.10-4, Existing Bikeways:

Most of the Class I bike paths shown are proposed or planned, but not existing.

Thank you again for allowing MTS to review and comment on the DEIR. We look forward to coordinating with the City on this project, and my staff is available to assist the project team as necessary. Please contact me at (619) 231-1466 or at Paul.Jablonski@sdmts.com if you have any questions or require any further information.

Sincerely,

A handwritten signature in black ink, appearing to read 'Paul Jablonski', enclosed within a large, loopy oval shape.

Paul Jablonski
Chief Executive Officer