

**From:** Allen Kashani [REDACTED]

**Sent:** Friday, February 20, 2026 8:41 AM

**To:** Segur, Suzanne <SSegur@sandiego.gov>

**Cc:** [REDACTED]

**Subject:** [EXTERNAL] SWV Specific plan

Hi Suzanne,

Our team wanted to provide some clarification in follow up to the email you received from Antonio Blas on the Otay Mesa Community Plan Amendment (PRJ-14791). As you know, the planning process for the Southwest Village Specific Plan included a comprehensive effort offering multiple opportunities for public input and participation as well as coordination with City of San Diego staff and other stakeholders. Mr. Blas's claim that property owners have not been informed is not accurate.

Tri Pointe Homes has maintained ongoing communications with Mr. Blas and several of the Oleander property owners throughout the planning process.

The Southwest Village Subcommittee was formed in 2018 by the OMCPG and consisted of five community members, including Mr. Blas. Subcommittee meetings were held regularly and provided opportunities for key stakeholders, property owners, interested members of the public and community organizations to learn more about plans for Southwest Village, share insights and provide feedback. Between May 2018 and December 2019, 15 Subcommittee meetings were held to address the following topics: land use, housing and density, design and placemaking, commercial and the Village Core, parks and public spaces, schools, connectivity and mobility, utilities and resources and implementation. On January 15, 2020, the Southwest Village Subcommittee, Mr. Blas included, provided a unanimous recommendation of approval of the current draft Southwest Village Specific Plan. Thereafter, and following a lengthy environmental review process, the Otay Mesa Community Planning Group also voted unanimously to recommend the proposed Southwest Village Specific Plan and Tri Pointe Homes' 920-unit VTM on June 18, 2025.

Throughout the process, Mr. Blas and other property owners have been notified by way of more than 14 meetings and over 30 projects eblasts and mailers, not including required public noticing. Additionally, our team met with Mr. Blas and several property owners at his request on July 13, 2024 as well as in advance of that meeting on July 9, 2024.

It's been a lengthy process, one that has included comprehensive outreach, and we hope we can proceed with the HRB public hearing as planned.

Please let us know if you have any questions.

Thank you,

Allen

 **Allen Kashani**  
SENIOR PROJECT MANAGER

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From: Tony Blas [REDACTED]

Sent: Monday, February 16, 2026 4:06 PM

To: Segur, Suzanne <SSegur@sandiego.gov>; [REDACTED]

[REDACTED]

Subject: [EXTERNAL] Otay Mesa Community Plan Amendment (PRJ-14791)

Senior Planner. Sussan Segur

My Name is Antonio Blas an owner of residential vacant lots I like to point out that the Planner (s) for Southwest Village Specific Plan (Tri Pointe Homes); **Has not being truthful to the multiple ownership of the Oilander Tract Subdivision as the tentative map directly affects many of the residential lots affected by the MHPA boundary line adjustment and we have not being notified properly, I have been involved for the last 40 years with anything that may affect our subdivision, in fact for the same reason I have joined the Otay Mesa subcommittee and the Southwest Village Specific Plan subcommittee.**

**FYI:**

**1 - Two very sensitive items: historically documented in the 1990's; (Two vernal pools of already documented size back then), same vernal pools that on recent years were artificially increased on size (man made), we have pictures of the site, that is affecting several owners of lots in the immediate perimeter of today's size of those vernal pools.**

**2 - The open space boundaries designated on the Southwest Village Specific Plan as open space, has been done without taking in consideration that the Oilander tract subdivision, is an already a County recorded and accepted subdivision; with public roads that should not be not subjected to this changes of open space.**

**NOTE: In the early stages of Pardee Homes planning, we assisted to about 20 meetings, where property owners, Pardee Homes representatives and City officials were present; every time, we the property owners questioned the open space and San Diego City representative always said we will get back to you.**

**3 - That to our understanding; is a requirement for raw land to be developed for the benefit of a developer; (Tri Pointe Homes).**

**Lately many of us (Oilander Tract subdivision Property owners) have not being sent Public Notices of anything that should be require for the developer to notify; directly adjacent and affected property.**

**I Antonio Blas would like to request a continuance of said public hearing until ALL Property owners are notified, we as property owners have a right to oppose anything that would devalue our properties. and designating many of our lots as open space is a valid reason.**

**As far as I understand many of those lots affected will be reduced to a future use of the property; only to 25% of the total area of each lot affected.**

Respectfully

Antonio Blas AKA Tony Blas Cell [REDACTED]

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February 20, 2026

VIA EMAIL

Dawna Marshall & Oscar Galvez  
City of San Diego Development Services Center  
1222 First Avenue, MS 501  
San Diego, CA 92101  
[DSDEAS@saniego.gov](mailto:DSDEAS@saniego.gov)

Re: Southwest Village Specific Plan Project (PRJ-0614791)

Dear Ms. Marshall and Mr. Galvez:

We submitted a comment letter on June 23, 2025 (“June Letter”) regarding the Southwest Village Specific Plan Project (“Project”) Draft Subsequent Environmental Impact Report (“SEIR”) (PRJ-0614791; State Clearinghouse No. 2004051076) on behalf of BDM Twenty LLC (“BDM Twenty”) and Otay Mesa LLC (“Otay Mesa”), two of the largest landowners in the proposed Southwest Village Specific Plan (“Specific Plan”) area. As discussed in the June Letter, the Draft SEIR failed to adequately disclose and analyze the full environmental impacts of the Project.<sup>1</sup> Unfortunately, the City’s CEQA and entitlement process has not been transparent or collaborative. The Project has been designed to benefit a single landowner, the Applicant, at the expense of the nearly 70 other landowners in the Specific Plan area. For more than half a year, the City has failed to respond to our many substantive concerns. As we emphasized in the June Letter, further outreach is critical to ensure that all owners and affected stakeholders are given the opportunity to provide meaningful input. This input would undoubtedly lead to changes to the Project, which should be analyzed in a revised SEIR that is recirculated for public review and comment. However, we understand that the City is commencing the hearing process for this Project at a Historical Resources Board hearing scheduled for February 26, 2026.

Accordingly, this supplemental comment letter is being transmitted to provide further technical expert support for the deficiencies set forth in our June Letter. Attached herein are three technical memoranda written by experts in the fields of CEQA, transportation, and fire response, who have over 10 decades of combined experience. As demonstrated in these technical expert analyses, there are serious flaws in the Draft SEIR’s environmental analysis, which must be corrected in a revised and recirculated Draft SEIR.

The fundamental purpose of an EIR is “to provide public agencies and the public in general with detailed information about the effect which a proposed project is likely to have on the environment.”<sup>2</sup> Accordingly, an EIR “shall include a detailed statement setting forth ... [a]ll

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<sup>1</sup> We submitted a supplemental comment letter on October 15, 2025 that addressed the incorrect property areas and boundary assumptions used in the environmental analysis and draft Specific Plan.

<sup>2</sup> Public Resources Code Section 21061.

significant effects on the environment.”<sup>3</sup> As discussed in the CEQA technical memorandum prepared by Meridian Consultants, included herein as Attachment 1, the Draft SEIR failed to evaluate the environmental impacts of the full Project in violation of CEQA. The Draft SEIR defines the Project as the proposed Southwest Village Specific Plan, which “would establish 30 Planning Areas (PAs) with residential, mixed-use, park, and open space uses, and would include up to 5,130 dwelling units and the creation of a village anchored by up to 175,000 square feet of commercial and retail uses in a mixed-use Village Core within a total of approximately 490 acres (see *Table 3-1, Southwest Village Specific Plan Development Summary*). The Specific Plan also identifies public facilities, including public and private parks, recreational trails, open space, and internal roadways.”<sup>4</sup> The Draft SEIR states that “[t]he Specific Plan provides detailed text and exhibits describing the range of land uses (residential, retail, commercial, office, mixed-use, parks, and open space), public realm, mobility network, and infrastructure that would occur in the Specific Plan area.”<sup>5</sup> For example, a specific development concept plan is included as Figure 1.2 of the Specific Plan, below.



<sup>3</sup> Public Resources Code Section 21100(b)(1).

<sup>4</sup> Draft SEIR p. 3-2.

<sup>5</sup> Draft SEIR p. 3-3.

Accordingly, the Draft SEIR was required to analyze the reasonably foreseeable environmental impacts of the full Project – i.e., the full buildout of the Specific Plan. The Draft SEIR, however, fell far short of this requirement. The Specific Plan establishes comprehensive regulations for each Planning Area, including the minimum and maximum number of residential units, commercial square footage, and infrastructure, roadway and other improvements. Yet the Draft SEIR analyzes certain Planning Areas at the project level and other Planning Areas at the program level, and the program level analysis lacks the detail required by CEQA and impermissibly defers analysis to a future time. For example, as discussed in the biological resources analysis in the Draft SEIR, surveys and mapping of special status species were conducted in the project level Planning Areas but not the program level Planning Areas, and the Draft SEIR states that such reconnaissance of the program level areas would occur in conjunction with proposed future development.<sup>6</sup> This is contrary to well-established case law that “[a]n EIR evaluating a planned land use project must assume that all phases of the project will eventually be built ... and must analyze, to the extent reasonably possible, the impacts of ... the entire proposed project.”<sup>7</sup> As the CEQA Guidelines explain, “[t]iering does not excuse the lead agency from adequately analyzing reasonably foreseeable significant environmental impacts of the project and does not justify deferring such analysis to a later tier EIR or negative declaration.”<sup>8</sup> Contrary to the analysis in the Draft SEIR, the City is not excused from the statutory mandate that an EIR “shall include a detailed statement setting forth ... [a]ll significant effects on the environment of the proposed project.” With respect to specific plan projects, California courts have explained that “‘tiering’ is not a device for deferring the identification of significant environmental impacts that the adoption of a specific plan can be expected to cause.”<sup>9</sup>

The Draft SEIR concedes that “[a]pproval of the Specific Plan would not approve any *physical development* (e.g., construction of housing or infrastructure). However, the SEIR assumes that such actions *are reasonably foreseeable future outcomes of the project*” (emphasis added).<sup>10</sup> Accordingly, the City’s decision to analyze only the development of 1,315 units in detail is not reasonable or supported by evidence. In fact, some of the technical analyses included in the Draft SEIR make assumptions regarding the number and type of dwelling units and commercial square footage under the full buildout of the Specific Plan area. For example, the air quality and noise environmental analyses assume 1,424 single-family residential units, 2,234 multi-family units under 20 dwelling units per acre, 1,472 multi-family units over 20 dwelling units per acre, and 175,000 square feet of commercial/retail uses.<sup>11, 12</sup> The lack of consistency and analyses is troubling.

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<sup>6</sup> Refer to Sections 5.4.1.2 and 5.4.1.3 of the Draft SEIR.

<sup>7</sup> *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 431. See also *Stanislaus Natural Heritage Project v. County of Stanislaus* (1996) 48 Cal.App.4th 182, 206.

<sup>8</sup> CEQA Guidelines Section 15152(b).

<sup>9</sup> See *Stanislaus Natural Heritage Project v. County of Stanislaus* (1996) 48 Cal.App.4th 182.

<sup>10</sup> Draft SEIR, p. 1-2.

<sup>11</sup> Refer to page 9 of Appendix B-1, Air Quality Analysis, and page 8 of Appendix I, Noise Analysis, of the Draft SEIR.

<sup>12</sup> Please note that different assumptions were made in other analyses. For example, as discussed on page 5.12-14 of the Draft SEIR, the VMT assessment was based on the following land use assumptions: 1,158 single family

The Project is similar to the project in Stanislaus Natural Heritage Project v. County of Stanislaus, which involved the proposed Diablo Grande Specific Plan that called for the creation of a 29,500-acre, 5,000-residential-unit destination resort and residential community.<sup>13</sup> In that case, the EIR was both a “program EIR” for the proposed Diablo Grande Specific Plan and a “project EIR” for phase 1 of that specific plan.<sup>14</sup> The Court held that the EIR was inadequate because it defeated a fundamental purpose of CEQA to inform the public and responsible officials of the environmental consequences of their decisions *before* they are made.<sup>15</sup> The Court explained that the proposed specific plan was the “project” to be analyzed under CEQA, and “[c]alling it a ‘program’ does not relieve the County from having to address the significant environmental effects of that project.”<sup>16</sup> Therefore, the County was “incorrect in asserting that the County may (1) deem the environmental effects of adopting the specific plan, whatever those effects may be, to be significant, then (2) approve the specific plan, and then (3) at some later time determine what the significant environmental effects are of the specific plan that has already been approved. The County did not here simply adopt or amend a general plan so as to permit the building of homes and golf courses. The County adopted a specific plan calling for the construction of those facilities and of other particularly described facets of the Diablo Grande Specific Plan.”<sup>17</sup>

Here, the City was required to analyze the full scope of the Project based on the information available at the time of the environmental review. However, in this case, the City chose to evaluate only a portion of the Project in detail merely because a full evaluation of the Project would have required more effort and time. Notably, Michael Printz, Assistant Deputy Director of the City of San Diego, stated the following in an email dated February 6, 2026:

“As to why Tri Pointe Homes is showing a ‘700-unit threshold’ for the construction of Beyer Boulevard West for their project-level review, the applicant’s traffic consultant has responded with the following:

*A SANDAG Traffic Model Select Zone Assignment defined the VTM-1 traffic split between Caliente Ave. (700 units) and Beyer Blvd. (220 units). Secondary emergency access is required at 200 units, which can be accommodated by either Beyer Blvd. or a different Emergency Vehicle Access (EVA) route. With the proposed EVA route south of the site, the project can continue to utilize Caliente Ave. up to 700 units. Adding more than 700 units to Caliente Ave. would require an updated analysis, which was not done to avoid delaying project processing.”* (Emphasis added.)

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residential units; 2,503 multi-family units under 20 dwelling units per acre; 1,469 multi-family units over 20 dwelling unit per acre; 175,000 square feet Commercial/Retail; 2 elementary schools; 17.6 acres of developed park. This demonstrates that reasonable assumptions could have been made and a precise development project is not required for environmental analysis under CEQA.

<sup>13</sup> Stanislaus, 48 Cal.App.4th at p. 186.

<sup>14</sup> Id. at p. 201-202.

<sup>15</sup> Id. at p. 182.

<sup>16</sup> Id. at p. 202.

<sup>17</sup> Id. at p. 202-203.

The City, as the Lead Agency under CEQA, failed to meet its burden under CEQA to allow for informed decision-making. “CEQA’s demand for meaningful information is not satisfied by simply stating information will be provided in the future.”<sup>18</sup> The Project is defined as the Specific Plan, which allows for the construction of over 5,000 residential units, and the full scope of the Project should have been evaluated in the Draft SEIR. The City cannot decide not to evaluate a certain aspect of a known and defined project in detail merely to make their analysis easier and faster.

Further, as discussed in the technical expert memoranda prepared by Raju & Associates, Inc. and Simpson Gumpertz & Heger, included as Attachments 2 and 3, the transportation and fire response analyses in the Draft SEIR are flawed, contain inconsistencies and omissions, and do not provide any support for the phasing of the roadway improvements. Notably, the 700-unit trigger for the development of Beyer Boulevard is not supported by any evidence, and there is similarly no evidence that Beyer Boulevard West is needed for development in the Planning Areas east of Caliente Avenue from a traffic, circulation, safety, or fire response standpoint.

The serious flaws and issues raised have a detrimental impact on all of the property owners in the Specific Plan area, except for the Applicant. Accordingly, we respectfully request that the Project and Specific Plan be revised to address the legitimate concerns of the property owners, including, among other things, by removing the Beyer Boulevard West extension from the phasing plan, and that the Draft SEIR analysis be updated and completed in a revised and recirculated Draft SEIR.

Thank you very much for your consideration.

Sincerely,



Francis Y. Park  
of PARK & VELAYOS LLP

cc: Ms. Heidi Vonblum, City Planning Director  
Mr. Michael H. Shoemaker  
Mr. William A. Spurgin  
Mr. Gerald M. Whitehead  
Ms. Marcela Escobar  
Mr. Steven Bossi  
Marcos D. Velayos, Esq.  
Jennifer L. Erickson, Esq.

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<sup>18</sup> Vineyard Area Citizens, 40 Cal.4th at p. 431.

**SALAZAR LAW, APC**  
LAND USE ENTITLEMENTS □ MUNICIPAL ADVOCACY

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**CHULA VISTA, CA 91915**

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January 22, 2026

**VIA EMAIL**

**TO (CEQA / DEIR)**

**Dawna Marshall**

Environmental Analysis Section  
Development Services Department, City of San Diego  
Email: DMarshall@sandiego.gov  
Email: DSDEAS@sandiego.gov  
Email: DSDEASNoticing@SanDiego.gov

**TO (SPECIFIC PLAN)**

**Oscar Galvez**

Senior Planner / Project Manager  
Development Services Department, City of San Diego  
Email: GalvezO@sandiego.gov

**RE:**

- 1. Draft Environmental Impact Report (DEIR) and Draft Southwest Village Specific Plan**
- 2. Comments Regarding Open Space Designation, Loss of Permitted Uses, Area 23 Planning History, and Density Redistribution Privately Owned Parcels in Area 23 – Existing AR-1-1 Zoning**

**I. INTRODUCTION**

My law office represents the owner of three parcels of land (6450741500, 6450762503, and 6450751700) located within Areas 3, 22 and 23 of the proposed Southwest Village Specific Plan, all of which are currently zoned AR-1-1 (Agricultural–Residential). The comments set forth below focus primarily on the parcels in Area 23, whose proposed and disclosed land use designation was changed to Open Space following the March 2020 DEIR scoping meeting.

This submission provides combined comments on the Draft Environmental Impact Report (“DEIR”) and the Draft Southwest Village Specific Plan, focusing on the treatment of privately owned parcels in Area 23 and the elimination or clouding of existing residential entitlements. My client was in full support of the specific plan and EIR until the project applicant unilaterally in their incomplete (incomplete as it does not have a list of permitted uses for all proposed land use designations) draft specific plan changed to Open Space the land use designation of my client’s property.

For the record, on Wednesday, January 21, I left voicemail messages for Ms. Marshall and Mr. Galvez requesting information regarding the DEIR and the Draft Specific Plan, respectively. I spoke with Mr. Galvez on Thursday January 22, 2026. During our conversation Mr. Galvez suggested that I submit my questions and comments via letter. Therefore, I am submitting these comments on the Specific Plan and Draft EIR.

## **PART A — CEQA COMMENTS ON THE DEIR**

### **1. Existing zoning establishes the CEQA baseline and includes economically viable residential uses**

The subject property is zoned AR-1-1, which affirmatively permits a single-family residence and related residential accessory uses, including ADUs and JADUs subject to applicable regulations. These uses constitute economically viable development rights and form the appropriate baseline for CEQA analysis.

### **2. The DEIR fails to clearly disclose whether existing AR-1-1 permitted uses are eliminated**

The Draft Specific Plan redesignates privately owned AR-zoned parcels in Area 23 as Open Space, yet does not identify permitted or conditionally permitted private uses applicable to that designation.

If residential uses currently permitted under AR-1-1 are eliminated or materially restricted, the project reduces established development rights. The DEIR does not clearly disclose this outcome or analyze its consequences.

### **3. Failure to analyze economic displacement and loss of productive use**

By redesignating privately owned AR-1-1 parcels as Open Space without identifying permissible private uses, the project appears to eliminate or materially cloud economically productive uses, including single-family residential development.

The DEIR does not analyze:

- loss of residential development potential;
- reduction in property utility or value; or

- whether the Open Space designation functions as a de facto reservation of private land for public purposes absent acquisition.

#### **4. Improper deferral and ambiguity in the project description**

The DEIR defers resolution of key questions—including permitted uses, acquisition intent, and interim restrictions—to future actions. CEQA does not allow deferral where a planning document establishes a binding regulatory framework.

Ambiguity regarding preservation of existing residential entitlements is itself a significant land-use impact requiring disclosure and analysis.

#### **5. Area 23 planning history: “potential park” policy designation versus regulatory zoning**

The Otay Mesa Community Plan identifies portions of Area 23 as potential park, which is a policy-level designation anticipating future public acquisition and implementation. By contrast, the existing zoning designation—AR-1-1—is regulatory and permits residential development by right.

The DEIR does not reconcile this distinction or analyze the impact of converting a policy-level “potential park” concept into a binding Open Space restriction that eliminates otherwise permitted residential uses.

#### **6. Area 23 includes both City-owned resource parcels and privately owned unconstrained parcels**

Area 23 consists of multiple parcels under mixed ownership. Two parcels are owned by the city and contain identified biological resources, while the remaining privately owned parcels do not contain mapped biological resources and are not designated as MHPA or MSCP land, as confirmed in the DEIR (see p. 300 of 1042).

The DEIR does not distinguish between resource-bearing City parcels and unconstrained private parcels when applying the Open Space designation, instead imposing a uniform restriction across Area 23.

#### **7. Improper extension of resource-based restrictions to unconstrained private land**

CEQA allows development restrictions to protect identified biological resources. However, the DEIR does not analyze or justify the application of Open Space restrictions to privately owned parcels within Area 23 that do not contain biological resources.

The DEIR fails to explain why parcels lacking environmental constraints are subject to the same development prohibitions as parcels containing biological resources, resulting in an unsupported extension of conservation measures beyond their factual basis.

### **8. Improper reliance on “potential park” designation without acquisition analysis**

The Otay Mesa Community Plan identifies portions of Area 23 as potential park, a policy-level designation that anticipates future public acquisition and implementation, not permanent regulatory prohibition of otherwise permitted private development.

The Draft Specific Plan and DEIR convert this policy designation into a binding Open Space restriction that eliminates residential development allowed under existing AR-1-1 zoning, without identifying any intent, funding source, or timing for acquisition, and without analyzing the consequences of holding privately owned land undeveloped indefinitely.

Nothing in the Otay Mesa Community Plan authorizes the use of a “potential park” designation to impose long-term development restrictions on privately owned land in the absence of acquisition.

### **9. Open Space designation functions as a park substitute without park designation or implementation mechanism**

The DEIR relies on the conservation of Area 23 to offset reduced park acreage elsewhere in the Specific Plan area. In doing so, Area 23 is effectively being used to serve a park function—supporting population-based recreational planning—without being designated as a park and without any acquisition or implementation mechanism.

This approach treats privately owned land as functional public open space while leaving ownership, maintenance, and economic burden with private landowners. The DEIR does not analyze the land-use, economic, or fairness implications of this approach.

### **10. Post-scoping land use map changes affecting Area 23**

An updated land use map depicting Area 23 as Open Space appeared on the Southwest Village Specific Plan website after the March 4, 2020 EIR scoping meeting and after the April 15, 2020 Otay Mesa Planning Group Southwest Village Subcommittee meeting.

The DEIR does not disclose when this change was made, how it was introduced into the public process, or how the land-use and economic consequences of this change were evaluated in the environmental analysis. This omission obscures the project’s evolution and prevents meaningful public review.

### **11. Redistribution of development capacity to applicant-owned land**

The Draft Specific Plan reflects increased residential density on land owned by Tri Pointe Homes IE-SD, Inc., with density ranges of approximately 30–62 dwelling units per acre, compared to the 20–44 dwelling units per acre range presented during scoping.

At the same time, privately owned parcels in Area 23 transition from AR-1-1 zoning with residential entitlements to a binding Open Space designation. The DEIR does not analyze whether residential capacity removed from Area 23 has been redistributed to applicant-owned parcels, nor does it evaluate the resulting land-use, housing, or economic impacts.

### **12. Required revisions to the Final EIR**

The Final EIR must:

1. Clearly state whether residential uses permitted under AR-1-1 remain allowed under the Open Space designation.
2. Analyze the land-use and economic impacts of eliminating or restricting those uses.
3. Distinguish between City-owned resource parcels and privately owned unconstrained parcels within Area 23.
4. Disclose timing and rationale for post-scoping map changes.
5. Analyze redistribution of development capacity within the Specific Plan area.
6. Clarification requested regarding acquisition intent and regulatory effect.

The City should clarify whether it intends to acquire Area 23 parcels. If not, the regulatory and economic effects of long-term Open Space restrictions must be disclosed and analyzed.

## **PART B — SPECIFIC PLAN COMMENTS**

### **13. Clarification of permitted uses under the Open Space designation**

The Specific Plan must clearly identify permitted or conditionally permitted private uses for Open Space parcels, including whether single-family residences and ADUs/JADUs remain allowed.

### **14. Clarification of acquisition intent and interim use**

The Specific Plan should clarify whether the City intends to acquire privately owned Open Space parcels that were previously permitted to be developed with single family homes (my client's property previously was improved with a single family home) and identify funding and timing, and specify what interim private uses are permitted pending any acquisition.

### 15. Need for clarification prior to adoption

Absent these clarifications, the Specific Plan creates uncertainty regarding property rights and development potential for privately owned parcels and should not be adopted without revision.

### III. CONCLUSION

The Draft Specific Plan and DEIR eliminate or materially cloud existing AR-1-1 residential entitlements, improperly extend conservation restrictions beyond resource-bearing parcels, misapply a “potential park” designation without acquisition analysis, and fail to disclose redistribution of development capacity.

These issues must be addressed in the Final EIR and Specific Plan prior to adoption.

Sincerely,  
SALAZAR LAW, APC

*/s/ Salvador M. Salazar*  
Salvador M. Salazar

### Attachments

#### A. AR-1-1 zoning map and permitted uses / zoning reference

<https://www.sandiego.gov/sites/default/files/legacy/development-services/zoning/pdf/maps/grid03.pdf>  
and <https://docs.sandiego.gov/municode/municodechapter13/ch13art01division03.pdf>

**B. Draft Southwest Village Specific Plan** <http://southwestvillageplan.com/southwest-village-interactive-map/> and Draft SP submitted by Project Applicant Page 37 of 200 on pdf [https://www.sandiego.gov/sites/default/files/2024-09/draft-svw-plan-reduced\\_0.pdf](https://www.sandiego.gov/sites/default/files/2024-09/draft-svw-plan-reduced_0.pdf)

#### C. Southwest Village EIR Scoping Presentation (March 4, 2020)

<http://southwestvillageplan.com/wp-content/uploads/2020/03/Southwest-Village-EIR-Scoping-Presentation-030420.pdf> and NOP <https://files.ceqanet.lci.ca.gov/88923-22/attachment/a1Ym0zQ7bqLgT76IoiGowvbsbahXn1xdcIXguq9jghv5d1iNh5S80AUlibiHzeJE3rlrB-Mt4Mz5yGKv0>

**D. Updated land use map(s) showing Area 23 designation changes from Residential to Open Space** <http://southwestvillageplan.com/southwest-village-interactive-map/> and Draft SP submitted by Project Applicant Page 37 of 200 on pdf [https://www.sandiego.gov/sites/default/files/2024-09/draft-svw-plan-reduced\\_0.pdf](https://www.sandiego.gov/sites/default/files/2024-09/draft-svw-plan-reduced_0.pdf)