

**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.

**Attachments:**

1. CEQA Technical Memorandum (Meridian Consultants)
2. Transportation Technical Memorandum (Raju & Associates, Inc.)
3. Fire and Emergency Technical Memorandum (Simpson Gumpertz & Heger)

# **Attachment 1**



860 Hampshire Road, Suite P  
Westlake Village, California 91631  
(805) 367-5720

## MEMORANDUM

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**Date:** February 20, 2026

**To:** City of San Diego

**From:** Tony Locacciato, AICP, Partner

**Subject:** Southwest Village Specific Plan Project Draft Supplemental Environmental Impact Report (PRJ-0614791; State Clearinghouse No. 2004051076)

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This memorandum addresses substantial flaws in the CEQA analysis of the Southwest Village Specific Plan Project (Project). The Southwest Village Specific Plan Project Draft Supplemental Environmental Impact Report (SEIR) analyzes the potential environmental effects of the proposed Project, which includes, among other entitlements, the proposed Southwest Village Specific Plan (Specific Plan). However, as discussed below, the analysis in the SEIR is incomplete, inconsistent, and failed to comply with CEQA. Further, there is no technical analysis in the SEIR to support the 700-unit threshold for the entire Specific Plan area, and such a threshold, if included, should be limited to the Planning Areas in the western portion of the Specific Plan area only.

This memorandum was prepared by Tony Locacciato, AICP, a founding partner of Meridian Consultants, who has over 4 decades of experience with the planning and environmental review of major specific plan projects, including managing the preparation of technical studies and environmental impact reports for major land development projects of similar size and complexity to the Southwest Village Specific Plan Project.

CEQA requires an EIR to include “a detailed statement setting forth ... [a]ll significant effects on the environment of the proposed project” (Public Resources Code Section 21100(b)). A fundamental purpose of CEQA is to inform the public and its responsible officials of the environmental consequences of their decisions before they are made.

Further, CEQA requires analysis of the whole of the project, inclusive of the development of the entire Specific Plan area as defined in the Specific Plan and SEIR. Section 1.2 of the Specific Plan states the Specific Plan establishes thresholds for maximum future development, provides supplemental development regulations, identifies required facilities (including roads and utilities), and defines processes for implementation of the Specific Plan. Section 7.7, Construction and Development Permits, of the Specific Plan states that the Specific Plan is being processed concurrently with a Planned Development Permit (PDP) and Site Development Permit (SDP) required

for qualifying development that because of its location, size, or some other characteristic, may have significant impacts on environmentally sensitive lands.

As described in these sections of the Specific Plan, this Specific Plan clearly defines a “specific development project” suitable for evaluation in a Project EIR, defined in Section 15161 of the CEQA Guidelines as an EIR that examines the environmental impacts of a specific development project, examining all phases of the project including planning, construction, and operation. Despite these clearly defined characteristics of the Project, the SEIR analyzes some components of the Project at a “Project” level and others at a “Programmatic” level contrary to the requirements of CEQA, which requires that the whole of this Project be analyzed in detail in the SEIR.

As stated in the Specific Plan and SEIR, the Specific Plan would permit the development of up to 5,130 residential units. Therefore, the SEIR was required to evaluate the environmental effects of developing up to 5,130 units throughout the Specific Plan area. The SEIR states 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.” (SEIR page I-2.)

Under CEQA Guidelines Section 15182, residential projects undertaken pursuant to and in conformance with a specific plan for which an EIR was prepared are exempt from further review under CEQA, unless substantial changes are proposed to a project that require major revisions of the EIR prepared for a specific plan project due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

The SEIR analyzed Phase 1 in detail but did not analyze the other phases defined in the Specific Plan in detail. CEQA requires a detailed analysis of the whole project rather than individual phases of a project.

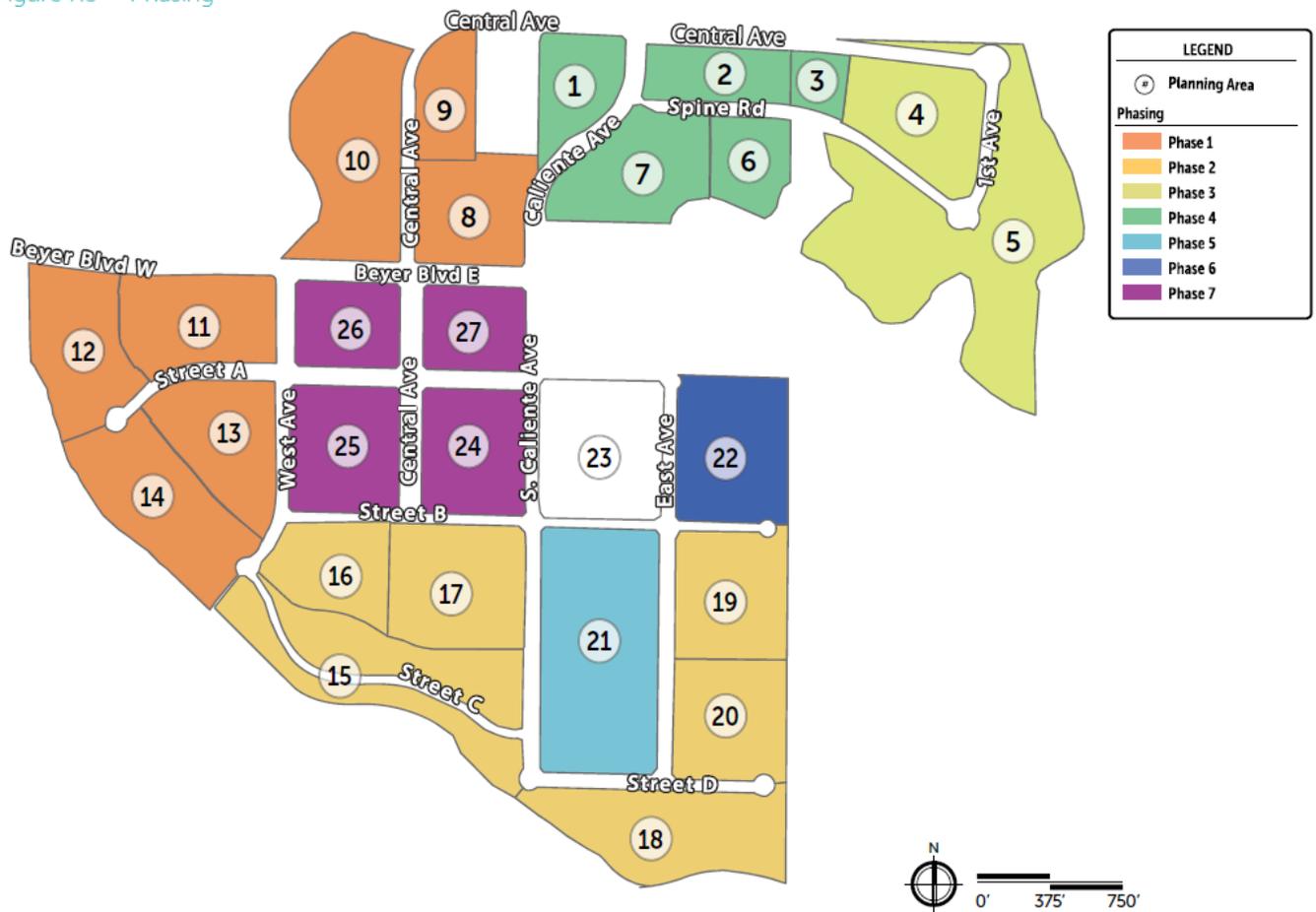
The Specific Plan addresses phasing in Section 7.14:

*Implementation of Southwest Village will require construction of new infrastructure and facilities, as well as improvements to existing infrastructure and facilities, as part of project implementation. Improvements will be necessary to the circulation network, drainage facilities, utilities (e.g., water, sewer, etc.) and other infrastructure. In addition, this document includes provisions for streetscape enhancement, pedestrian elements and overall design policies. **These improvements will be phased according to the associated planning area(s) being developed.***

(Emphasis added.)

While the Specific Plan states that the land use assumptions in Table 7.2, Phasing Summary, represents the anticipated chronological order of development, there is no information or explanation of how the Phasing Plan (Figure 7.3 of the Specific Plan, also included as Figure 3-2 of the SEIR) shown below reflects the intended chronological order of development. Phase 1 includes a Vesting Tentative Map (VTM) for Planning Areas 8 through 14 as defined in the Specific Plan and identified on the Phasing Plan. This VTM would allow development of up to 1,315 dwelling units. No explanation for the definition of the other 6 phases in the Phasing Plan is provided. Phase 2 includes Planning Areas 15-20, property owned by the applicant for the VTM for Phase 1, which may be the reason this portion of the Specific Plan area is included in Phase 2.

Figure 7.3 – Phasing



There is no explanation of how Phases 3 through 7 were defined or relate to existing or planned infrastructure. Phases 3 and 4 include Planning Areas located adjacent to existing developed areas with access provided by an existing road, Caliente Avenue. Phase 7 includes the interior portion of the Specific Plan area, adjacent to areas identified as Phase 1 and Phase 2 areas, so developing this area last does not seem logical or likely to occur. However, regardless of the lack of logic in the phasing, the physical environmental impacts of each phase were required to be analyzed in detail in the SEIR, and this was not done.

The proposed phasing is a major component of this Project and, for this reason, additional definition, description, and analysis of the potential environmental effects of the phasing of the Project on access and circulation, emergency evacuation, biological resources, and other topics is needed to fulfill the requirements of CEQA for the SEIR to support informed decision-making. Contrary to the requirements defined in CEQA, the SEIR concludes that certain program-level impacts are significant without conducting the analysis needed to support this conclusion, clearly deferring the analysis of these impacts to subsequent environmental review, contrary to CEQA requirements.

Instead, the SEIR only evaluates the Phasing Plan as defined in the Draft Specific Plan, despite clearly stating that phasing may occur in any order, and more than one phase may occur at one time. Because the phasing may occur in any order, evaluation of alternative phasing plans in the SEIR is needed to allow the decision-makers to fully consider this important aspect of the Project. The approach taken improperly shifts the burden for defining and analyzing alternative phasing plans to the owners or future developers of the Planning Areas not included in the VTM proposed at this time, including Planning Areas 8-14 and Planning Areas 15-20, because future approvals are needed for development of these other Planning Areas. All the primary components of the Project, including the proposed roadway improvements, are fully defined, and should, for this reason, be fully analyzed in the SEIR.

Instead, the responsibility for analysis of components of the Project identified as “Programmatic” is shifted to the owner or developers of future phases, inconsistent with the requirements of CEQA, which mandates that environmental considerations do not become submerged by chopping a large project into many little ones based on approval actions, each with a minimal potential impact on the environment, but which may cumulatively result in significant impacts. Merely calling certain portions of the Specific Plan Project a “Program” does not relieve the City from having to address the significant environmental effects of the full Project in detail in the SEIR at this time to provide the information needed by decision-makers on the potential environmental effects of the Project.

With regard to access and circulation, the proposed Transportation Phasing Plan in Appendix J-2 of the SEIR states that Beyer Boulevard will be constructed with a 2-lane cross section to avoid and minimize impacts to sensitive habitat, as requested by California wildlife agencies, and that sufficient right-of-way is not available to construct portions of Beyer Boulevard.

Specific constraints to the construction of the extension of Beyer Boulevard as identified in Appendix J-2 include environmental and topographic challenges within Moody Canyon; cut and fill quantity limitations; the Furby Preserve 100% Conserved parcel that bisects the Beyer Boulevard alignment; the County Multiple Habitat Conservation Plan (MHPA) designation; the 90 feet of right-of-way required for Beyer Boulevard West; and the Otay Mesa Community Plan Update designation of Beyer Boulevard as a 4-lane Major Arterial. A May 7, 2020 email message in page 6 of Attachment A to Appendix J-2 states: “Everything along Beyer between the project boundary to the San Ysidro boundary is in a Multi-Habitat Planning Area (MHPA), including the County of San Diego Furby Preserve. We have minimized our footprint of Beyer Rd from the very beginning in response to this to minimize MHPA and particularly conservation preserve lands.”

The approach to addressing these significant environmental constraints and potential impacts is to require the construction of the extension of Beyer Boulevard as a 2-lane road for Phase 1 prior to development of the 700<sup>th</sup> dwelling unit and as a full planned 4-lane road with Phase 4 prior to the development of the 3,301<sup>st</sup> dwelling unit. It is clear from the information in the SEIR that additional environmental analysis will be necessary for the expansion of Beyer Boulevard west from 2 to 4 lanes, since the SEIR failed to analyze the full buildout of Beyer Boulevard West.

Again, because the expansion of Beyer Boulevard west to 4-lanes is included in Phase 4, this important roadway improvement, which is fully defined, should be fully analyzed in the SEIR, and not at a “Programmatic” level, which is inconsistent with applicable CEQA standards. Clearly the expansion of Beyer Boulevard to 4 lanes will result in additional environmental impacts that are not adequately analyzed in the SEIR.

The Project Description states that the proposed VTM, which would allow development of up to 1,315 dwelling units, will be implemented in 3 sub-phases, 1a, 1b and 1c, with Phase 1c including the construction of the Beyer Boulevard West connection to San Ysidro prior to the issuance of a building permit of the 700<sup>th</sup> dwelling unit. However, if the Phase 1 VTM project is not fully implemented in Phase 1, and 700 units are not developed, then the requirement to construct the Beyer Boulevard West extension would be the responsibility of projects proposed in any of the Planning Areas, whether or not the extension of Beyer Boulevard West is needed to provide adequate access and circulation for development in other Planning Areas.

While the SEIR identifies a series of environmental and other constraints to the full development of the planned 4-lane cross-section of Beyer Boulevard, the responsibility for constructing this improvement is required for Phase 4, prior to the issuance of a building permit for the 3,301<sup>st</sup> dwelling unit. Phase 4, as proposed, includes Planning Areas 1, 2, 3, 6 and 7, which are located along the northern edge of the Specific Plan area on both sides of the planned southerly extension of Caliente Avenue, an adjacent existing street.

Given the significant constraints associated with the construction of Beyer Boulevard as proposed in the Specific Plan, the SEIR should include an analysis of alternative phasing for the planned roadway improvements. These alternatives should include allowing the development of Planning Areas in the northeastern and southeastern portions of the Specific Plan area to develop based on the capacity of Caliente Avenue and other streets to provide access.

The planned extension of Beyer Boulevard is needed to support development of the Planning Areas in the western portion of the Specific Plan area, but there is no information in the SEIR demonstrating that the extension of Beyer Boulevard is needed for development in the Planning Areas in the eastern portion of the Specific Plan area, as access can be provided from existing streets. Analysis of additional phasing plans is clearly required to provide adequate information on how the Project can be phased to minimize potential potentially significant environmental effects.

In summary, the analysis in the SEIR is flawed and provides no support for the proposed Phasing Plan, particularly with regard to the development of Beyer Boulevard West, as there is no evidence anywhere in the SEIR that this roadway is required for development in the Planning Areas east of Caliente Avenue. The analysis should be revised and the SEIR should be recirculated to allow for review and comment on this revised analysis.



# Tony Locacciato, AICP

## Partner

*Practice Group Leader, Environmental Compliance and Planning*

### About

Mr. Locacciato is an urban and regional planner with over 40 years of diverse experience in planning and environmental analysis. His background in public sector planning, consulting, and private development results in a unique understanding of the relationships between land use regulations, environmental review requirements, and the implementation of projects.

Mr. Locacciato has experience in land use planning; land use studies; the preparation of Specific Plans, Master Plans, Environmental Assessments (EAs), Program and Project Environmental Impact Reports (EIRs), Supplemental EIRs and Addendums to EIRs, Initial Studies, and Mitigated Negative Declarations (MNDs); compiling documentation to support both statutory and categorical exemptions, and site feasibility and constraints analysis. He provides a wide range of environmental consulting services to public agencies, including the preparation of EIRs, the review of EIRs, and the direction of mitigation monitoring programs.

Mr. Locacciato has been involved in the planning and environmental review of commercial, industrial, residential, and mixed-use projects in urban and rural settings for communities throughout California as well as for a wide variety of public infrastructure and public facility projects. His specialty is the management of complex multidisciplinary projects including mixed use master plans and specific plans. Mr. Locacciato provides oversight and direction of projects and directly manages complex projects as a partner of Meridian Consultants.

### Education

Bachelor of Science, City and Regional Planning  
California Polytechnic University, San Luis Obispo

### Affiliations

American Institute of Certified Planners

American Planning Association

Association of Environmental Professionals

Urban Land Institute

## Project Experience

Project manager for the **RiverPark Specific Plan EIR** for the **City of Oxnard**. This EIR evaluated the impacts of the largest mixed-use project ever approved in Ventura County. The 700-acre RiverPark project originally included 2,800 residential units and 2.8 million square feet of commercial development. The land plan reflects new urbanism planning principles and incorporates a mixed-use town center. The project involves the annexation and reclamation of an existing sand and gravel mine site located next to the Santa Clara River, a sensitive area for biological resources. Mr. Locacciato directed the preparation of a full range of detailed technical studies and prepared a detailed full-scope EIR addressing all topics. Mr. Locacciato also reviewed and directed the preparation of the Specific Plan by the applicant. Mr. Locacciato has been the City's primary consultant on this project for the last 20 years and has managed the preparation of 15 Addendums to the original EIR evaluating amendments to the approved specific plan over time.

Project manager for the 500-acre **East Area 1 Specific Plan** EIR for the City of Santa Paula. Over the past 15 years, Mr. Locacciato managed the preparation of the full range of technical, environmental, and economic studies to guide the preparation of a Specific Plan and EIR for this project and supported the review and approval of a Sphere of Influence amendment and annexation of this area by the County of Ventura Local Agency Formation Commission. He also managed the preparation of a comprehensive Supplemental EIR for a major amendment to the approved specific plan in 2015 and is currently preparing an amendment to the Specific Plan and an Addendum to the previous EIRs to increase the number of allowed residential units from 1,500 to 2,050.

Project manager for the **Runkle Canyon Specific Plan** EIR for the City of Simi Valley. This specific plan was prepared to allow for the development of a master-planned residential community on 1,595 acres, containing a mix of residential densities, natural open space, a neighborhood park, a multiuse trail system, and an area for a potential future public golf course. The specific plan allows 460 homes on approximately 150 acres in the northern portion of the specific plan area. Approximately 1,454 acres will remain in open space and recreational uses,

including a 10-acre neighborhood park, 1,150 acres of natural open space, and approximately 220 acres designated for the potential future development of a public golf course. In addition to supporting the adoption of the Specific Plan by the City of Simi Valley, this EIR served as the environmental clearance document for approval of annexation of this site by the Ventura Local Agency Formation Commission (LAFCO).

Project manager for the **Inglewood Transit Connector EIR** for the **City of Inglewood**. Mr. Locacciato manages the preparation of a broad array of detailed technical studies and a comprehensive EIR evaluating the proposed Inglewood Transit Connector, an approximately 1.6 mile fully elevated, automated, fixed-guideway transit system with three new transit stations approved by the City to bridge the "last mile" transit gap between new major employment, commercial, housing and entertainment centers in the City and the Metro K light rail line. This EIR provided detailed analysis of the impacts associated with construction of this transit system as well as the transportation benefits, including substantial reductions in Vehicles Miles Traveled (VMT) and traffic congestion.

Project manager for the **Travertine Point Specific Plan** EIR for the County of Riverside. The County of Riverside certified this EIR and adopted the Specific Plan for this new 5,000-acre master planned community in December 2011. Travertine Point is a new town planned on the northwest shore of the Salton Sea. The majority of this Specific Plan area is located in Riverside County with a portion located in Imperial County. Portions of the project site also include Torres Martinez Desert Cahuilla Indian tribal lands. This comprehensive EIR addresses a Specific Plan permitting the development of over 16,655 new homes and 5 million square feet of commercial and light industrial development. This full scope EIR includes extensive analysis of traffic impacts, greenhouse gas and other air quality impacts, cultural resource, and other impacts, as well as a Water Supply Assessment.

CEQA Project Manager for the **LAX International Airport Land Access Modernization Project (LAMP) EIR** for Los Angeles World Airports (LAWA). This EIR evaluated a comprehensive reconfiguration of all ground access to LAX including construction of an Automated People Move (APM) and six stations, three in the Central Terminal Area, and off-site intermodal transportation facilities (ITFs) and

a consolidated rental car facility (CONRAC). This EIR addressed numerous issues related to historic structures (the iconic Theme Building), traffic and transportation, re-location of major infrastructure, and use compatibility, and other topics. As part of the project, substantial agency consultation was conducted with federal, state, and local agencies.

Project manager for the **Warner Bros. Studio Master Plan Expansion EIR** for the City of Burbank. Mr. Locacciato organized and conducted public scoping meetings and prepared an Expanded Initial Study to determine the scope of this EIR, which addressed master plans for two separate studio sites in the City of Burbank. The project involved plans to add more than 4 million square feet of new studio facilities over a 20-year period. Traffic, aesthetics, historical resources, and neighborhood compatibility were major issues of concern. Mr. Locacciato also prepared an addendum to this EIR for the City that provided a detailed analysis of a multilevel parking garage located next to an existing residential neighborhood.

Project manager for the **San Dimas Downtown Specific Plan (DTSP) EIR**. This EIR, certified in November 2024, evaluated this specific plan proposed to 2024 to establish a planning and zoning framework to encourage transit-oriented development in Downtown San Dimas while preserving the character of the historic commercial district. The DTSP encourages compact development near the new Foothill Gold Line Light Rail Line transit station. DTSP allows new housing, retail, employment, and hospitality uses within the DTSP Area and is a key program to implement the City's 2021 - 2029 Housing Element.

Project manager for the **Ontario International Airport South Airport Cargo Center (SACC) Project EIR and NEPA Environmental Assessment (EA)**. The proposed SACC project includes the development of a 345,000 square foot Air Cargo Sort building, truckyard, aircraft apron improvements, parking structure, roadway improvements, and site improvements, including landscaping and utility improvements. The 97-acre project site, located immediately south of the runways is occupied by existing aviation related structures proposed for demolition as part of the project. Analysis of construction operational impacts, including the effects of additional flight operations, were analyzed.

Project director for the preparation of the **Glendale Town Center (Americana at Brand) Mixed Use Project EIR** for the Glendale Redevelopment Agency in Glendale. This EIR provided a comprehensive analysis of a mixed-use commercial and residential project on a key 16-acre site in the center of downtown Glendale. The Glendale Town Center includes 475,000 square feet of retail and entertainment uses, with 338 residential units in the upper floors of the buildings. The major objective of this project was to connect major facilities and development in the downtown area, including the adjacent Glendale Galleria Mall, the existing retail development along Brand Boulevard, and the City's Central Library by creating pedestrian connections through the site and the new public park, which would serve as the centerpiece of the Project. A full project EIR was prepared, and Mr. Locacciato managed all phases of the environmental review process for the redevelopment agency. A lawsuit was filed on the adequacy of the EIR, which was found to be adequate by the Los Angeles Superior Court; and this decision was upheld on appeal.

Project director for the **Claremont Village South Specific Plan (VSSP) EIR**. The VSSP defines a vision, policies, and standards to guide transit-oriented, mixed use development near the existing Claremont Metrolink Passenger Rail station and planned Foothill Gold Line Light Rail Line transit station. The VSSP defines a clear and illustrated vision for the future of Village South, specific goals and guiding principles, objective design, and development standards to implement a community-based vision for this southern and further expansion of Claremont's historic Village.

Project Manager for the **Hollywood Central Master Plan Sustainable Communities Environmental Assessment (SCEA)** for the City of Los Angeles. This mixed-use project includes 633 residential units with 67,000 square feet of restaurant/retail space and 45,000 in 4 existing and 4 new buildings in a key central location in Hollywood. SCEAs are prepared under CEQA for transit oriented development.

Project manager for the **San Fernando Corridors Specific Plan Amendment EIR** for the City of San Fernando. This amendment updated the City's existing Downtown Specific Plan to promote the development of a walkable, mixed-use, multi-modal environment accommodating housing, retail, office, and light industrial uses near the

existing Sylmar/San Fernando Metrolink station and planned new light rail or bus rapid transit line connecting down Van Nuys Boulevard to the Van Nuys Orange Line and Amtrak/Metrolink stations.

Project Manager for the **Acrisure Arena** project in the community of Thousand Palms in the Coachella Valley. Mr. Locacciato managed an entitlement and environmental review program to gain approval of this project by Riverside County in approximately 7 months. He formulated an amendment to an approved 455-acre mixed use specific plan that allowed the arena while reducing the intensity of other allowed uses to result in no changes to the significant impacts identified in the County's original EIR for the specific plan. A comprehensive Addendum was prepared to the County's original EIR to document that the effects from construction and operation of this arena, planned as the home for a new American Hockey League team, the Coachella Valley Firebirds, concerts, and other entertainment events would not result in new or substantially greater impacts.

Project manager for the **NBC Studios Master Plan** EIR for the City of Burbank. The Master Plan was designed to meet the changing needs of NBC and the media sector. The master plan included six new studios, each consisting of approximately 23,000 square feet and four 15-story office buildings, and each containing approximately 475,000 square feet of space. Required parking was provided through the construction of multilevel parking structures, which included more than 7,000 spaces. Development of these facilities was phased to meet the business needs of NBC. This EIR was prepared and certified within 7 months.

Project Manager for the **Music Festivals Plan EIR, EIR Addendum, Categorical Exemption and Annual Mitigation Monitoring** for the City of Indio. Over the past decade, Meridian has supported the long-term planning for these world famous festivals. The project proposed an amendment to the City of Indio Municipal Code to adopt an ordinance pertaining to Major Music Festival Event Permits; a Major Music Festival Event Permit; and a Development Agreement. The Major Music Festival Event Permit allowed an increase in attendance for the Coachella and Stagecoach Music Festivals and for two events in the fall through 2030. The EIR analysis focused

on the potential environmental impacts to local and regional air quality and greenhouse gases, biological resources, land use compatibility with the surrounding residential neighborhoods, noise associated with the festival events, public services, and traffic on the surrounding communities. After certification of the original EIR, Meridian prepared a comprehensive Addendum to evaluate increasing the attendance levels and a Categorical Exemption supporting the extension of the permits and development agreement through the year 2040. Meridian also provides noise monitoring on an annual basis during these events by providing online real-time noise monitoring data for six locations around the 600-acre festival site.

Project manager for the **Burbank Media Center** EIR for the City of Burbank. Over a period of 4 years, Mr. Locacciato prepared two project EIRs for a mixed-use project proposed on a 4-acre site at a key location in the Burbank Media District. As originally proposed, the Burbank Media Center consisted of 925,000 square feet of development, including office uses; a business- and visitor-serving hotel; a health club; a childcare facility; retail space; and a church in 3-, 6-, and 18-story buildings. The first EIR included an analysis of several alternative configurations of uses and buildings on the site. After the original project was not approved, Mr. Locacciato prepared a second EIR for the City, evaluating four additional development scenarios at an equal level of detail to assist the City in determining the appropriate intensity of development for this site. After completion of the second EIR, the City approved a residential and retail commercial project.

Project director for the **City of South Pasadena General Plan Update Program EIR**. The project involved the update of the City of South Pasadena General Plan with the exception of the Housing Element.

Project director for the **Sierra Madre Master Environmental Assessment (MEA) and General Plan EIR** in Sierra Madre, California. The MEA was compiled to provide information to the City's General Plan Advisory Committee for use during the process of updating the General Plan. The EIR was prepared after the draft update of the General Plan was completed based on the information in the MEA.

Project manager for the **City of Palm Desert General Plan Update EIR Addendum** for the University Park Specific Plan (UNSP) project. The UNSP addresses approximately 400 acres, and provides for the development of a new, mixed-use community adjacent to planned campuses for California State University San Bernardino and the University of California Riverside. The UNSP was prepared to implement the City's 2035 General Plan. Mitigation measures identified in the City's General Plan required additional studies to be completed at the time individual development projects are proposed including a greenhouse gas study, biological resource evaluation and a Phase I archeological assessment that were prepared as part of this Addendum. Meridian Consultants also prepared a Water Supply Assessment for this project for the Coachella Valley Water District.

Project manager for the **City of Santa Monica Master Environmental Assessment (MEA)** in Santa Monica. This MEA was prepared during a moratorium on commercial and industrial development in the City in order to provide a comprehensive source of information on environmental conditions throughout the City. This MEA also included an analysis of the potential cumulative effects of development based on a master list of projects for the entire City. This MEA was prepared based on available published information and is updated on an annual basis.

Project Director for the **RiverPark Residential Project** for the City of Long Beach. The RiverPark Project proposes the redevelopment of a 20-site in the City's Wrigley Heights neighborhood, contaminated by prior use to treat wastewater from drilling oil wells in the area, into a residential community containing 226 detached and attached single-family units on the southern 15 acres of the 20-acre Project Site and 5 acres of Public Open Space on the northern portion of the Site. Key issues addressed in this EIR included remediation of the existing hydrocarbon contamination of the site, and the relationship of the proposed residential uses to the City's General Plan and past plans for adding park space along the portion of the Los Angeles River the site is located on.

Project manager for the **Wilshire Vermont Joint-Use** project Addendum to the EIR for the Los Angeles Community Redevelopment Agency and the Metropolitan Transportation Agency in Wilshire. Mr. Locacciato prepared a comprehensive addendum to the Wilshire

Center and Koreatown Redevelopment Project EIR evaluating a mixed-use residential and retail commercial project proposed on the site above the Metro Red Line's Wilshire/Vermont Station. The project included 444 residential apartments planned in six levels above a ground level containing approximately 30,600 square feet of retail commercial space. Parking was provided in a 3-story subterranean parking structure containing 732 parking spaces. Reconfiguration of the portal to the Red Line Station was also a part of the project.

Project manager for the **Wilshire Boulevard Temple** Master Plan EIR for the City of Los Angeles. This master plan addressed the renovation of the Wilshire Boulevard Temple, designated as a City of Los Angeles Historic-Cultural Monument and listed in the National Register of Historic Places and California Register of Historic Resources, and the addition of a new school and other facilities to this key block on Wilshire Boulevard to accommodate its evolving spiritual, educational, community, and administrative programs. The main topic addressed in the EIR was the compatibility of new buildings with the existing historic building on the site.

Project manager for the **University Gateway** EIR for the Los Angeles Community Redevelopment Agency. This 8-story, 630,000-square-foot residential and commercial building at the northwest corner of the intersection of Figueroa Street and Jefferson Boulevard provided 421 new student apartments designed to accommodate up to 1,656 University of Southern California (USC) students, with retail commercial uses on the ground floor. The project is located within the Exposition/University Park Redevelopment Project Area and is also part of the Figueroa Corridor. Key issues associated with this project and preparation of the environmental analysis included the provision of adequate on- and off-site parking, consistency with the Exposition/University Park Redevelopment Plan and the South Los Angeles Community Plan; impacts on the adjacent historic Shrine Auditorium; aesthetic impacts; and traffic and parking impacts on the surrounding community.

Project director for the **City Center II** project in the City of Glendale. This mixed-use residential and hotel high-rise development project includes a 20-story residential tower and an 18-story hotel/residential mixed-use tower. In addition, a retail/café component is to be provided on the

ground floor of the east tower and would open up to the existing City Center I Plaza. A full project EIR was prepared based on direction from the Glendale Redevelopment Agency. Issues addressed in the EIR included land use and planning, population and housing, aesthetics, geologic and seismic hazards, hydrology and water quality, traffic and circulation, air quality, noise, archeological and historic resources, hazards and hazardous materials, public services, utilities and services systems, and recreation.

Project manager for the **Figuroa and Adams Student Housing** project EIR for the City of Los Angeles. This project involved the development of a residential building containing 137 student housing units and replacement parking for an adjacent church on Figuroa Street near the University of Southern California (USC). Key issues addressed in the EIR included historic resources and aesthetics because of the presence of adjacent historic properties; archaeological resources due to the potential for impacts to a portion of a late 1800s water delivery system, and to encounter buried remains of a circa 1888 residential complex; traffic and circulation; and the effects of construction on air quality and noise.

Project director for the **California State University, Northridge (CSUN) Master Plan** EIR. The Master Plan for the 353-acre San Fernando Valley campus was proposed to enable the University to accommodate the growing enrollment and broadening range of programs offered on the campus. The Master Plan addresses the expansion of academic and administrative facilities; the enhancement of campus open space; the expansion of student housing and dining facilities; the development of faculty and staff housing; improved vehicle and pedestrian access and circulation; new parking facilities; and upgrades of campus utilities. The EIR evaluated the overall Master Plan as well as a number of the individual new buildings and facilities included in the Master Plan. Major issues included traffic and circulation, parking, housing, and a range of aesthetic issues, including balancing increased campus development with retention of open space and the creation of an attractive, distinct campus identity along the community interface.

Project director for the **Brentwood School Education Master Plan** EIR. The Brentwood School, a private K–12 coed day school, currently operates on two separate

campuses located east and west of Sunset Boulevard in the community of Brentwood, within the City of Los Angeles. The Master Plan provides for adding approximately 240,000 square feet of new facilities to both campuses and guiding land use and development at the school for the next 25 years. The majority of the new facilities would be added to the East Campus, which houses the middle and high school; the smaller portion of new facilities would be added to the West Campus, which is home to the elementary school. Key issues relate to the compatibility of the new facilities with the surrounding residential neighborhoods, including visual, traffic, and circulation impacts. Impacts during construction are also being thoroughly assessed to address neighborhood concerns.

Project director for the **Azusa Pacific University Master Plan** EIR for the City of Azusa. This long-range Master Plan provided for the addition of new educational facilities on the east and west campuses located in Azusa. The objectives of the Master Plan included balancing the uses on both campuses by providing additional student housing and parking on both campuses in addition to new classroom buildings. Key issues included the compatibility of the proposed increase in intensity of uses on the campus with existing surrounding neighborhoods and the proposed redevelopment of the Azusa Drive-In Theater, which is designated as a historic resource and eligible for listing on the California Register of Historic Resources as the last drive-in theater on historic Route 66 in the state.

Project manager for the **Sun City Shadow Hills Master Plan** EIR for the City of Indio. This full-scope EIR, prepared over a 7-month period for the City, evaluated the first major development project proposed in Indio's Gateway Conceptual Specific Plan Area in north Indio. The Shadow Hills project consisted of a proposal to develop a private, age-restricted residential community on approximately 800 acres with 2,500 single-family homes, a golf course, and 65 acres of commercial uses. Key issues included compatibility with the Bermuda Dunes Airport, changes to the General Plan Circulation Plan for north Indio, and the preparation of one of the first SB 610 Water Supply Assessments (WSA) for a major project served by the Coachella Valley Water District.

Project manager for the **Sun City Shadow Hills Expansion** for the City of Indio. This Supplemental EIR evaluated the

addition of 305 acres to the Sun City Shadow Hills community to allow for the development of a third phase. This full-scope EIR evaluated the proposed development of an additional 1,200 homes and an 18-hole golf course on the expansion area.

Project manager for the **Desert Dunes Specific Plan** EIR for the County of Riverside. This comprehensive EIR evaluated the adoption of a Specific Plan by the County of Riverside to allow 2,250 homes to be developed on 475 acres located around the existing Desert Dunes golf Course located 2 miles north of the I-10 Freeway and 1 mile south of the City of Desert Hot Springs in the Coachella Valley.

Project manager for the **Northwest Golf Course Community Specific Plan** and EIR for the City of Oxnard. Managed a multidisciplinary team to prepare a specific plan for the addition of 18 holes to an existing golf course and the creation of a compatible community of 450 homes. The golf course extension was planned on a closed landfill, and an amendment of the approved closure plan was required as well as an adjustment of the sphere of influence for the City and annexation of the property.

Project manager for the **North Shore at Mandalay Bay** EIR for the City of Oxnard. Managed the preparation of a series of technical studies to determine the feasibility of redeveloping a closed oil field waste site for residential uses. A comprehensive consultation process with responsible agencies was conducted to determine the scope of the EIR for the project. The EIR evaluated a proposal for 450 waterfront homes on this 80-acre site in the coastal zone.

Project manager for the **Central LA Middle School No. 3** project for the Los Angeles Unified School District in Los Angeles. This EIR evaluated a new 789 two-semester seat middle school in a new 30-classroom building on a 2.5-acre site above the Metro Red Line Wilshire/Vermont Station.

Project manager for the **Chaffey Community Master Plan** for the Chaffey Community College District in Rancho Cucamonga. This EIR looked at the Master Plan for expansion of the main campus on Haven Avenue in the City of Rancho Cucamonga. Major issues included the impacts of changes in the access and circulation system

for the campus and traffic impacts on the streets surrounding the campus.

Project manager for the **Canyon Oaks** Supplemental EIR for the County of Los Angeles. This comprehensive Supplemental EIR evaluated a revised project proposed for a sensitive 100-acre site in the Santa Monica Mountains. Previous proposals for this site had been under review for over 12 years. Visual impacts, land use compatibility, effect on community character, biology, grading, geologic stability, and water quality were issues of concern.

Project director for the **Mountaingate South** EIR for the City of Los Angeles. Mountaingate South is located in a steep canyon area of the Santa Monica Mountains. The project area totaled 281 acres with development on 61 acres with 29 dwelling units. The remaining portions of the project area are dedicated as permanent open space. A full-scope EIR was prepared for this project with key issues including plant and animal habitats, fire management, and viewsheds.

Project manager for preparation of the **Sun City Tehama Specific Plan** EIR for the County of Tehama. This project proposed the development of a master-planned, mixed-use community including residential, commercial, and institutional uses. The proposed Specific Plan would allow for the development of a total of approximately 4,200 residential units, with the majority (approximately 3,700 units) comprised of an age-restricted retirement community. Approximately 500,000 square feet of commercial uses were also initially proposed. Mr. Locacciato prepared and circulated a comprehensive full-scope EIR for Tehama County and also prepared a revised EIR for recirculation after the project was modified in response to comments on the original Draft EIR. Major issues include the provision of public services to this planned new community and the impact of the project on the adjacent I-5 Freeway.

Project director for the **Antelope Valley Enterprise Zone** EIR for the Cities of Palmdale and Lancaster and the County of Los Angeles. This program EIR evaluated the potential impacts of designating a 28,000-acre area under the jurisdiction of the cities of Lancaster and Palmdale and the County of Los Angeles as an Enterprise Zone. The EIR was prepared within a short time frame based on existing

planning and environmental documents previously prepared by the three jurisdictions.

Project manager for the **Douglas Ranch Specific Plan** project for the City of Simi Valley. The Specific Plan provides for the development of several residential areas and a cemetery on a hillside site.

Project director for the **West Main Street Corridor Redevelopment Master Plan** EIR in Alhambra. The project involved a Master Plan for the redevelopment of a five-block portion of West Main Street in downtown Alhambra, as well as the redevelopment of four sites in downtown Alhambra totaling approximately 13.96 acres, and would result in the creation of nearly 70,000 square feet of commercial uses, 725 residential units, including for-sale condominiums and rental apartments, and offices. Proposed redevelopment is intended to complement the previous redevelopment of West Main Street in the adjacent Civic Center district of Alhambra. Key project elements include the creation of comprehensive design standards for use throughout the West Main Street redevelopment area, the creation of public open space, the provision of affordable housing, and the relocation of the public library. Major issues to be addressed included aesthetics; traffic and circulation; population and housing, including relocation of existing businesses and residents; and historic architectural resources.

Project manager for the EIR for the **Downtown Specific Plan for the Uptown and Town Center** areas of the City of Paso Robles. The goals of the Specific Plan included continuing revitalization of the City's historic downtown district while encouraging appropriate infill development. The EIR evaluated the growth projected to occur under the new Form-Based Code included in the Specific Plan. Key issues evaluated in the EIR identify environmental impacts within five key walkability sheds, which represent the extent of the distance a typical pedestrian will walk (approximately 5 minutes or one-quarter of a mile). Environmental issues evaluated in the EIR will include impacts to the Salinas River Corridor from Specific Plan implementation, transportation and traffic impacts, infrastructure improvements, land use and planning, cultural and historic resources, and public services.

Project director for the **Verdugo Gardens** EIR in the City of Glendale that evaluated a proposed 24-story residential condominium building, including 287 housing units; 3,600 square feet of ground-floor retail-commercial uses; a public open space plaza and park; landscaping; lighting; utilities; subterranean and above-grade parking, which would be screened from public streets with perimeter housing; and associated amenities. A full project EIR was prepared based on directions from the Glendale Redevelopment Agency. Issues addressed in the EIR included land use and planning, population and housing, aesthetics, geologic and seismic hazards, hydrology and water quality, traffic and circulation, air quality, noise, archeological and historic resources, hazardous materials, public services; recreation; and utilities and service systems.

Project director for the **Walmart Food Distribution Center** EIR for the City of Barstow. This EIR evaluated the proposed West Barstow Specific Plan No. 4, which authorizes the construction and operation of a 1-million-square-foot regional food distribution center on approximately 145-acres of land in Barstow. Topics evaluated in this EIR included aesthetics, agricultural resources, air quality, biological, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services, recreation, transportation and traffic, and utilities and service systems.

Project manager for the **Thousand Oaks Boulevard Specific Plan** EIR for the City of Thousand Oaks. This proposed Specific Plan addressed more than 275 acres within the core of the City of Thousand Oaks along 3.5 miles of Thousand Oaks Boulevard. This Specific Plan regulates the mix of land uses, heights, setbacks, and parking requirements allowed within the Specific Plan Area and contains new development standards allowing mixed-use projects, increased height and density, and master planned streetscape and landscape standards to improve the visual and pedestrian character of the Boulevard. The EIR evaluated the potential impacts of up to 1.1 million square feet of commercial development and 370 housing units within the Specific Plan area.

# **Attachment 2**

## TECHNICAL MEMORANDUM

**TO:** City of San Diego

**FROM:** Srinath Raju, P.E.

**SUBJECT:** Southwest Village Specific Plan Project (PRJ-0614791)

**DATE:** February 19, 2026

**REF:** 795

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This technical memorandum discusses the evaluation of the traffic analysis in the Draft Supplemental EIR (Draft SEIR) for the Southwest Village Specific Plan Project (Project). This memorandum was prepared by Srinath Raju, President of Raju Associates, Inc. Mr. Raju has a master's degree in civil engineering and is a Professional Engineer (Traffic) in the state of California. He has over 40 years of consulting experience in transportation planning, travel demand forecasting and model development, traffic engineering and parking. Mr. Raju has prepared numerous transportation studies in support of environmental documents prepared as part of community plans, specific plans, and master plans.

As summarized below, the traffic analysis and reports in the Draft SEIR are flawed and provide no support for the proposed phasing plan, particularly with regard to the development of Beyer Boulevard West. Further, no evidence is provided that Beyer Boulevard West extension is necessary for the development of the Planning Areas (PAs) east of proposed Caliente Avenue.

Based on the Southwest Village Specific Plan Programmatic Level Vehicle Miles Traveled Assessment (Appendix J-1 of the Draft SEIR), the Project is projected to generate 57,225 daily trips, of which approximately 4,800 trips would occur during the morning peak hour and approximately 6,000 trips would occur during the evening peak hour. Given the substantial number of trips generated by the Project, a sub-regional or regional travel demand model with an updated traffic analysis zone system to reflect the Project areas and supporting network updates should be

prepared to capture the appropriate effects of the Project on the regional trip distribution patterns. However, the transportation phasing plan memo seems to be relying on an older regional forecast with older assumptions and unknown network updates to evaluate the community plan circulation network changes. For example, the older regional forecast utilized trip generation for the SWVSP area that was substantially lower than what is proposed, leading to an erroneous conclusion of infrastructure needs.

The forecasts used in the transportation phasing analysis (presented in the Southwest Village Specific Plan Transportation Phasing Plan Memo included as Appendix J-2 of the Draft SEIR (Transportation Phasing Plan)) are not reflective of current approvals in the immediate area (for example, the Candlelight Project), do not reflect potential future traffic conditions and, therefore, cannot be used in the justification of the proposed changes to the circulation system (including Caliente Avenue and Beyer Boulevard) as they relate to ensuring that the circulation network still functions at the community level. The future forecasts do not include all the traffic associated with the Specific Plan and adjacent areas, thereby potentially underestimating the infrastructure needs relative to the circulation system.

A Select Zone Assignment (SZA) from SANDAG Model (Series 13) was utilized for determining the Project's trip distribution. As shown in Attachment D of the Transportation Phasing Plan (Appendix J-2 of the Draft SEIR), the SZA was performed with the trip generation of the "Select Zone" (TAZ 4948 representing the entire Southwest Village Specific Plan area) being only 6,200 daily trips (see attached exhibit, which is included as Attachment I in the Southwest Village VTM-1 (PA 8-14: Residential) Local Mobility Analysis Report, included as Appendix J-4 of the Draft SEIR (LMA)). As shown in the SZA output (attached exhibit), the two centroid connectors have daily trips equivalent to 1,482 trips (24% to/from selected zone and Beyer Boulevard) and 4,718 trips (76% to/from selected zone and Caliente Avenue) for a total of 6,200 daily trips. Per the Transportation Phasing Plan (Draft SEIR Appendix J-2), Table 1, the Project is estimated to generate 57,225 daily trips; 4,777 AM peak hour trips and 5,948 PM peak hour trips. Utilizing an SZA model run with approximately 6,200 average daily trips (ADT) compared to the Project's estimated 57,225 ADT for trip distribution purposes and eventually facilities assessment ignores the overall effect of these trips on regional trip distribution and erroneously estimates transportation infrastructure requirements. Further, given that the model utilized the entire Specific Plan area as one TAZ (TAZ 4948), there is not enough detail in the model (i.e., various Planning Areas in the Specific Plan area

SANDAG  
Series13

Regional Model  
Year 2012

Otay Mesa

Select Zone Run  
TAZ 4948

Version 13.3.3  
Scenario ID1315

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Selected Zone(s)

# Select Zone Vol and %

# Model Estimated ADT

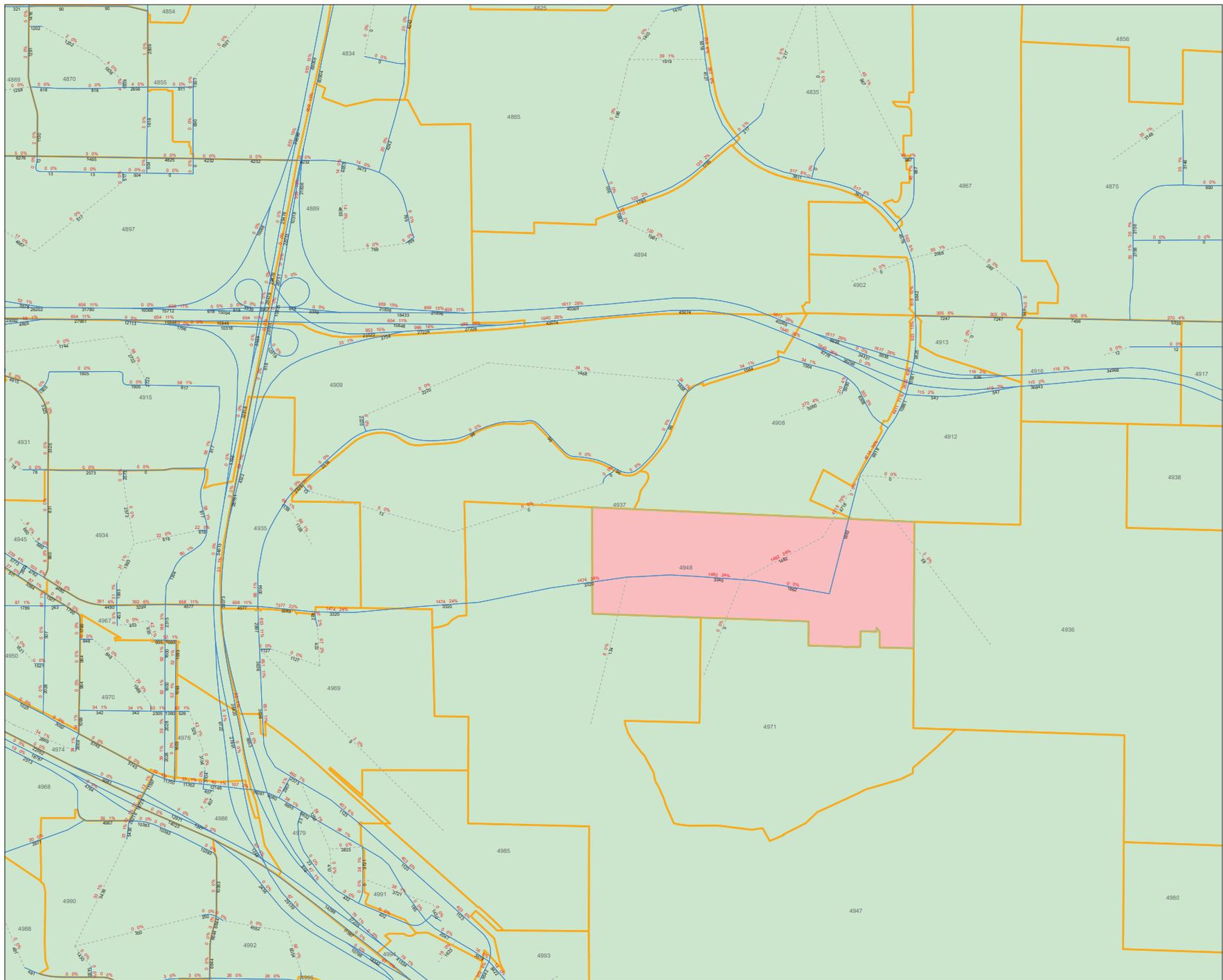
Portions of this map contain information from the San Diego Association of Governments (SANDAG) Regional Information System. This product cannot be reproduced without the written permission of SANDAG.

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Date: July 2, 2021



reflected by different TAZs on either side of Caliente Avenue and Beyer Boulevard along with appropriate proposed detailed network connections) to provide the required information related to overall Project trip distribution, particularly for those trips generated west of Caliente Avenue versus those trips generated from uses east of Caliente Avenue. Given the large number of daily and peak hour trips to and from the Specific Plan area uses, a detailed travel demand model with the required TAZ system and associated socio-economic data (SED) in the Project area should have been developed, calibrated, validated and implemented for the Project and model runs conducted to accurately estimate the Project's effects on sub-regional and regional trip distribution patterns. The travel forecasts used in the Transportation Phasing Plan and LMA (Appendix J-2 and Appendix J-4 of the Draft SEIR) lack a consistent methodology and approach, making the results and evaluation of the same unreliable and inconsistent.

The LMA does not provide information on the land use assumptions, transportation network assumptions and other critical model input data used in the SZA model run. It is of critical importance to utilize consistent land use and network assumptions in the complete model run (including the SZA and its associated SED) to obtain reliable and consistent results relative to Project trip distribution. Therefore, the actual trip distribution percentages could be very different than those presented in the transportation phasing analysis, LMA and other relevant documents, if the appropriate trip generation for the entire Specific Plan area were used in the model along with consistent assumptions for land use, network changes, etc.

The phasing of the Beyer Boulevard extension and connection to the west based on the SZA presented in the transportation phasing analysis and LMA do not appear to be related to any constraints in the roadway system operation, but more to offer connectivity with the neighboring community of San Ysidro. The overall trips on the Beyer Boulevard links (shown in the SZA exhibit) indicate that 55% of the trips are "cut-through" trips (1,862 out of 3,345 daily trips on Beyer Boulevard and the connecting segment of Caliente Avenue) that are not originating from or are destined to the Specific Plan area. Therefore, due to the reasons noted above, the requirement of the Beyer Boulevard extension should not be tied to any specific level of development of the Specific Plan area but rather as a regional connection that the city and county could pursue separately, at a later point in time. Rapid transit improvements to and from the Specific Plan area and the San Ysidro community should also be considered as noted in the OMCPU.

The 700-unit trigger for the extension of Beyer Boulevard West without demonstrating the operational improvement to ensure that the network still functions at a community level, artificially imposes a de facto moratorium on other future development within the Specific Plan area.

The SZA provides information only on the trip distribution of the “Selected Zone(s)” and does not provide information on when a certain facility would be needed or triggered, nor would it provide information to determine a phasing plan for a project. The phasing of the Project and the Beyer Boulevard West extension must be tied to the performance of the Caliente Avenue roadway corridor and key intersections since that roadway is the primary access facility to the regional roadway system to and from the Specific Plan area. The Applicant’s traffic consultant acknowledged that the transportation studies assumed 700 units and was not based on a trigger derived from performance of Caliente Avenue with over 700 units in the Specific Plan area.

The SZA output indicates that the Beyer Boulevard extension and connection to its current terminus in San Ysidro provides improved inter-community access but not any congestion relief in terms of improving traffic operating conditions in the vicinity of the Specific Plan area, and consequently, does not reflect an accurate traffic trigger. Therefore, the SZA output cannot be used as a basis for the phasing analysis as reflected in the transportation studies and Draft SEIR.

The ADT assumptions do not appear to be applicable and should be verified. The LMA states that the ADT for Beyer Boulevard and Caliente Avenue were analyzed using volumes from the San Ysidro Community Plan (adopted in 2016), as the horizon year ADT was based on a Series 12 SANDAG traffic model forecast. The LMA explained that the Otay Mesa Community Plan (adopted in 2014) was not applied because it used an older Series 11 SANDAG traffic model forecast. However, the future ADT volumes in the San Ysidro Community Plan, which are shown in Figure 3-16 therein, are specific to the roadway segments in that area and are not generally applicable to roadways that merely have the same roadway classification, which is what the LMA appears to assume.<sup>1</sup> For example, Figure 3 of the LMA states that the ADT of both Beyer Boulevard West and East is 28,100 and states that this is the volume from the San Ysidro Community Plan. However, Figure 3-16 of the San Ysidro Community Plan shows a varying ADT of 11,700 to 28,800 along Beyer Boulevard west of Otay Mesa Road (and, notably, there is no portion of the roadway with a

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<sup>1</sup> The San Ysidro Community Plan can be accessed at [https://www.sandiego.gov/sites/default/files/final\\_sycpu\\_jan\\_2018-1.pdf](https://www.sandiego.gov/sites/default/files/final_sycpu_jan_2018-1.pdf).

28,100 ADT). Further, the LMA assumes, without providing any support, that a consistent ADT of 28,100 would apply along the entire length of Beyer Boulevard West and East; however, how could the two-lane Beyer Boulevard West have the same estimated ultimate ADT as the four-lane Beyer Boulevard East? (Refer to Table 4.1 in the Specific Plan.)

The traffic study (Appendix J-1) states that the cumulative projects were identified at the time of the Notice of Preparation, which was February 26, 2020, over five years ago. The cumulative project list is severely out of date and, therefore, invalidates the cumulative traffic analysis. The cumulative impact analysis needs to be updated and included in a recirculated SEIR.

Further, the 2024 opening year is not possible given that the SEIR was published in 2025. The traffic study limited the cumulative projects to those that had an opening year on or before year 2024. This impermissibly limits the scope of the analysis and does not account for cumulative projects that will open in 2025 and beyond, which therefore underestimates cumulative impacts. For example, the BDM Mixed Use Project (PTS # 673818), which, in fact, is mentioned in the LMA, is not accounted for. Similarly, the traffic counts were collected in 2022 and are out of date and should also be updated.

The conclusion that the reduced widths of Beyer Boulevard and Caliente Avenue would not cause hazard or safety issues are conclusory and not supported by substantial evidence.

The SEIR states that the construction of the two proposed school sites on the Specific Plan area would accommodate the Specific Plan-generated growth; however, in the interim phases prior to school construction and operations, students generated from the proposed Specific Plan would need to attend school in temporary classroom facilities outside of the Specific Plan area, either on an interim (5 years or less) or permanent basis. Were the traffic effects of potential temporary classrooms evaluated? Do both school sites need to be developed to accommodate the growth? On the other hand, if a school is developed on PA 7 and not PA 16, how will that affect traffic and access for PAs 4 and 5?

In summary, there are a number of flaws and inconsistencies in the transportation analyses in the Draft SEIR. Importantly, the analyses fail to provide any technical justification for the 700-unit trigger for the extension of Beyer Boulevard West.

# SRINATH RAJU, P.E.

*President*



## **Education**

- Ph.D Program., Civil Engineering, Virginia Polytechnic Institute & State University
- M.S., Civil Engineering, Virginia Polytechnic Institute & State University
- B.E., Civil Engineering, Bangalore University, Bangalore, India

## **Professional Affiliations**

- American Society of Civil Engineers
- Institute of Transportation Engineers

## **Previous Positions**

- Kaku Associates, Inc., *Vice President*
- Kaku Associates, Inc., *Principal Associate*
- Barton-Aschman Associates, Inc., *Senior Associate*

## **Experience Profile**

Mr. Raju has over 40 years of experience in Transportation Planning, Engineering and Parking.

### **Travel Demand Forecasting**

- Was responsible for the development of over thirty travel demand forecasting models for various Community Plan areas in Los Angeles, California; Landside Access Modernization Program EIR/EA in Los Angeles, California, Port of Los Angeles, Inglewood Transit Connector in Inglewood, California, Playa Vista Master Plan in Los Angeles, California, and Ontario Airport Ground Access Model, Ontario, California; NBC Universal Evolution Plan in City of Los Angeles; Harford County, Maryland; Burbank Golden State Project Study Reports for interchanges in the City of Burbank; and Union Station area in Washington D.C.
- Involved in developing and implementing travel demand forecasting models for an eleven-county region in Northern New Jersey, Houston Metropolitan area, Houston, Texas, and Alameda County Modeling Area, Alameda, California; I-710 Major Investment Study, California; Valley Boulevard - Alhambra Avenue Connector Road at the SR 710 terminus in the City of Los Angeles.
- Implemented WASHCOG's mode choice model on *emme/2* for Maryland National Capital Parks and Planning Commission, Montgomery County, Maryland.
- Involved in development and application of a nested logit mode split model for the City of Shanghai, China.

### **Transportation Planning**

- Principal planner involved in the development of a transport model for the LAX Landside Access Modernization Program (LAMP) Project and application of the same in the preparation of the EIR and EA for the LAMP Project. Prepared numerous targeted traffic engineering and planning studies for various components of LAMP Project at LAX.
- Project Director for the Village at Playa Vista Project, Westchester Community Plan Update, Coastal Corridor Transportation Study, SR-90 Extension PSR Traffic Study, NBC Universal Evolution Plan, and Inglewood Transit Connector LPA Project.
- Project Manager for various transportation planning studies including Community Plan Revisions for the West Adams-Baldwin Hills-Leimert and Sylmar Communities; Community Plan Updates for Palms-Mar Vista, Westwood-West Los Angeles and Venice Communities in the City of Los Angeles; San

# **SRINATH RAJU, P.E.**

## *President*



Bernardino County Transportation Plan; Malibu City General Plan, California; Allentown, Pennsylvania; Harford County, Maryland; and Arlington County, Virginia.

### **Traffic Engineering**

- Conducted various traffic impact, micro-simulation and site access studies in support of EIRs/EISs in the Port area, Downtown Los Angeles and within various cities in the LA Metropolitan area including the Cities of Irvine, Tustin, Newport Beach, Anaheim and Santa Ana in Orange County; the Cities of Los Angeles, Beverly Hills, Santa Monica, Inglewood, Hawthorne, El Segundo, Torrance, Pasadena and Culver City in Los Angeles County; and at LAX for Terminal 1 Improvements Project.
- Conducted numerous traffic studies in Reno, Nevada; Honolulu, Hawaii; Germantown, Gaithersburg, Bethesda and Silver Spring in Maryland; Charlotte, North Carolina; White Plains and New York City in New York; Union Station and Downtown in Washington D.C.; Arlington, Alexandria and Crystal City in Virginia; and Philadelphia and Allentown in Pennsylvania.
- Project Manager/Engineer on various redevelopment projects involving preparation of transportation sections of EIRs/EISs in the cities of Los Angeles, Inglewood, and Hawthorne, California.

### **Parking**

- Conducted parking studies for the Cities of Irvine, Tustin, Newport Beach, Santa Monica, Fresno and Los Angeles, California; Charlotte, North Carolina; Washington D.C.; and Bethesda, Maryland.
- Also conducted studies for major development projects, colleges and universities, stadiums (RFK in Washington D.C. and Anaheim Stadium in Anaheim, California) and other recreational facilities in California, Washington D.C., Maryland and Virginia.
- Conducted various planning studies for large development proposals for Playa Vista in the western portions of Los Angeles, Warner Center in the San Fernando Valley in Los Angeles, and the Union Station area in Washington D.C.
- Project Engineer on major transportation planning projects, namely the Shanghai City Comprehensive Transportation Planning Study, Shanghai, China; the San Juan Metropolitan Transportation Study, San Juan, Puerto Rico; the Golden State Framework Transportation Study, Burbank, California; the Alameda County Transportation Plan, Alameda, California; and Community Plan Updates for Sherman Oaks, Mission Hills, Van Nuys, Encino, Canoga Park and Reseda Community Plan Areas.

### **Transit Planning**

- Involved in numerous transit planning studies including the Inter-County Express Bus Study, Orange County, California; Inglewood Transit Connector Project, Inglewood, CA ; the Inner-City Transit Needs Assessment Study in Los Angeles, California; and the Kauai County Bus Transit System Study in Kauai, Hawaii.

### **Highway/Corridor Studies**

- Conducted corridor studies in Burbank, California, I-710 corridor in California, I-270 corridor in Montgomery County, Maryland, and Route 29 Corridor in Silver Spring, Maryland.

# **Attachment 3**



20 February 2026

City of San Diego

Project 251574– Southwest Village Specific Plan Project (PRJ-0614791)

To Whom it May Concern:

This technical memorandum discusses the evaluation of the fire and emergency response analysis in the Draft Supplemental EIR (Draft SEIR) for the Southwest Village Specific Plan Project (Project). This memorandum was prepared by Nathan Wittasek, a fire protection engineer and code consultant specializing in wildfire mitigation and building fire engineering; a resume is attached. As summarized below, the fire and emergency response analyses in the Draft SEIR contain limitations and internal inconsistencies and provide no substantial evidence in support of the proposed phasing plan, particularly with regard to the development of Beyer Boulevard West. Further, no evidence is provided that the Beyer Boulevard West extension is necessary for the development of the Planning Areas east of proposed Caliente Avenue. The trigger to build the Beyer Boulevard West extension at 700 units was not based on a demonstrated inability to evacuate safely. The requirement to complete the Beyer Road extension by the 700th unit appears to be a policy-driven phasing trigger. It was introduced “for transportation and circulation purposes,” not due to any finding that evacuation fails at 699 units. Nowhere does the Wildfire Evacuation Simulation conclude that an evacuation at 699 homes would be unsafe but suddenly becomes safe at 700 with Beyer open. In short, 700 units is a planning milestone in the Specific Plan, not a proven life safety or circulation threshold.

The Wildfire Evacuation Study included as Appendix E of the Draft SEIR (WES) includes inconsistent assumptions and other flaws. A few examples are summarized below.

The WES used a basic formula (number of vehicles divided by a fixed road capacity) to estimate evacuation clearance times. This static approach does not account for real-world emergency traffic management tactics, such as phased departures, police-controlled intersections and ramps, use of shoulder lanes, or contraflow operations. Further, the total clearance time (how long it takes all vehicles to exit) is only one factor in wildfire safety, and the WES failed to account for other factors.

The WES did not use micro-simulation or time-stepped traffic modeling. By relying solely on static calculations, it could not show how traffic queues would form and dissipate over time, or how interventions during the critical first hour of evacuation could relieve bottlenecks. The

absence of dynamic simulation likely overestimates how long peak congestion would last in an actual evacuation.

It appears that the WES underestimated cumulative impacts. Table 8-1, Cumulative Projects, of the Draft SEIR lists 23 projects. However, the WES only includes seventeen cumulative projects, and the projects listed therein are different than the Draft SEIR. This list is incomplete given the 2024 opening year assumption and should be updated comprehensively in a revised Draft SEIR to reflect related projects that are relevant to the cumulative impact analyses consistent with the proposed buildout years of the Project, including any extended term contemplated in the Development Agreement. Also, Figure 9, Cumulative Projects, of the WES is blank with four tags that do not show cumulative projects.

In addition, the calculations of the population and vehicle estimates in Table 4 of the WES do not account for the commercial area of the related projects. Further, the WES assumes that the 5,130 units would include 3.39 persons per unit but does not provide any support for the 3.39 person per unit assumption. The WES also assumes that an average of two persons per vehicle would occur during an evacuation but does not provide any support for this assumption.

The Specific Plan area appears mapped in a Very High Fire Hazard Severity Zone per the latest CAL FIRE maps (published prior to the publication of the Draft SEIR). However, the Draft SEIR fails to account for this mapping in the wildfire and fire public services analysis. Moreover, the WES does not include a quantitative severe-weather evacuation analysis that discloses and tests key assumptions. CEQA requires disclosure of the assumptions supporting the analysis of reasonably foreseeable emergency conditions and impacts. Accordingly, the Draft SEIR and WES should evaluate reasonably foreseeable severe conditions relevant to evacuation planning (e.g., strong winds such as Santa Ana conditions, dry conditions, full or near-full buildout, peak occupant load, and constrained roadway segments such as the initial two-lane configuration of Beyer Boulevard).

In the event of a wildfire, the Draft SEIR states that the last vehicle would be evacuated from the Specific Plan area and onto one of the primary evacuation roadways in over 4 hrs (approximately 246 min.), which is extremely lengthy. The Draft SEIR should analyze additional evacuation roadways and/or alternate roadway configurations to minimize the evacuation time frames. The Draft SEIR states that the evacuation timeframe "is informational only as full-scale, mass evacuation events are now extremely rare due to the rise of wildfire evacuation technology that allows evacuations to be precisely managed to evacuate smaller populations in a successive phasing to minimize traffic surges." The Draft SEIR fails to provide details or evidence in support of this. For example, what fire spread rate is assumed? What would the evacuation timing be without the full construction of Beyer Boulevard West? The Specific Plan (p. 157) states that future projects that include more than 200 units shall submit a Fire Plan to the City for review that demonstrates (1) there are two separate access points; and (2) said access points shall be placed at a distance not less than half of the maximum overall diagonal dimension of the

planning area to be served. What is the basis of the 200-unit threshold? These are critical questions that need to be addressed in the CEQA environmental analysis.

While Figure 6.4 of the Specific Plan is intended to illustrate phased fire access, the graphic presents multiple layers of information simultaneously, including Planning Areas, phasing boundaries, directional arrows, and the Secondary Emergency Vehicle Access alignment. As currently configured, the overlapping colors and directional indicators make it difficult to clearly discern the specific access configuration applicable to any single interim phase. For a reader attempting to understand how fire apparatus would access the site at a particular stage of buildout, the diagram may not provide a sufficiently clear or sequential depiction of conditions. A phase-by-phase graphic or simplified series of diagrams showing interim fire access conditions would improve clarity and better communicate how emergency access is maintained during each stage of development.

Further, the evacuation calculations in the WES and Draft SEIR are misleading. The WES states that the total number of vehicles for existing conditions and opening year 2024 is 3,798, and assuming a roadway capacity of 2,500 vehicles per hour ("VPH"), the evacuation would take approximately 91.5 min. However, the 3,798 vehicles calculation understates existing conditions; as shown in Table 4 of the WES, this number only accounts for the existing year residential vehicles (1,926) and the opening year residential vehicles (1,872) but not the existing institutional vehicles (636) or the opening year non-residential vehicles (which are not listed in Table 4). An explanation is buried in footnote (g) of Table 4, which states that "[t]hese numbers represent the combined population totals for those uses included in the Weekend Evening evacuation scenario analyzed herein, which includes all residential uses and excludes institutional and commercial uses that would not be expected to be operational during an evening evacuation scenario. Further, the commercial uses proposed as part of the project are expected to serve the project's population and are not considered regional commercial uses." An evacuation could occur at any time, and in fact is more likely to occur during the day when temperatures are at a peak. By relying on an evening evacuation scenario that excludes institutional and commercial uses, the WES understates evacuation demand and does not provide a conservative estimate of wildfire impacts. Further, the WES states that "[i]f all evacuation traffic is considered for Existing Conditions and Opening Year 2024, the total number of vehicles would be 4,198 and 5,196, respectively," and for Phase 1a and 1b, "[i]f all evacuation traffic is considered for Existing Conditions and Opening Year 2024, the total number of vehicles would be 5,638 and evacuation would be anticipated to take 270.6 min. It is anticipated that the project Phase 1c would add approximately 88.3 min. to the Existing Condition + Opening Year 2024 conditions." These numbers are buried in the WES and not mentioned in the Draft SEIR, which summarily states that the evacuation time for the full buildout of the Project would be approximately 246 min. The analysis should be revised to provide a conservative analysis using worst-case data, as the existing analysis fails to provide a legitimate picture of the evacuation times that would actually occur when Project residents are trying to evacuate.

In addition, the General Plan (2024) Public Facilities, Services and Safety Element includes Fire Services and Infrastructure Policy PF-D.1, which establishes response time requirements (e.g., first-due unit within 7.5 min. 90% of the time, and a multiple-unit response of at least seventeen personnel within 10.5 min. 90% of the time, measured from receipt of the 911 call in fire dispatch). The Draft SEIR fails to include an analysis of emergency response times. Conflicts with Fire Services and Infrastructure Policy PF-D.1 are not disclosed or analyzed.

Further, the incomplete related projects list identified above and the related wildfire analyses should be corrected in a revised WES.

Lastly, the Draft SEIR unduly burdens later phases to mitigate wildfire risk. For example, Mitigation Measure SP-HAZ-1 is imposed on the program-level, but not the project-level development.

In summary, there are many errors and omissions in the fire analyses in the Draft SEIR and WES. Further, there is no evidence that the Beyer Boulevard West extension is required for the properties east of Caliente Avenue from a fire safety standpoint. A performance-based phasing approach is recommended: establish measurable evacuation and emergency response objectives (including credit for committed near-term improvements and operational measures such as the Secondary EVA) and require completion of Beyer Boulevard West when those objectives cannot be met without it or another alternative.

Sincerely yours,



Nathan B. Wittasek, P.E., CFEI, CASp  
Principal

CA License No. 1534 (Fire Protection)

CASp Certification No. CASp-707

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Encl.



## Nathan B. Wittasek

**P.E., LEED AP, CASp**

Principal

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### REGISTRATIONS

#### Professional Engineer

AZ	CA	CO
FL	GA	ID
NV	OR	WA
WY		

### OTHER

Certified Access Specialist (CASp)

Certified Fire & Explosions Investigator (CFEI)

Deputy Building Inspector, Smoke Control, City of Los Angeles (P031371)

Hazardous Waste Operations and Emergency Response Training in accordance with OSHA 29

CFR 1910.120, 1926.65

LEED Accredited Professional

National Council of Examiners for Engineering and Surveying (NCEES)

### EDUCATION

**Worcester Polytechnic Institute, Worcester, MA**

M.S. in Fire Protection Engineering, 1997

B.S. in Civil Engineering, 1995

Nate Wittasek brings a practical, science-based approach to fire protection engineering, reflecting his diverse training and experiences in academia, code consulting for new and existing facilities, performance-based fire protection engineering, resiliency design, and fire service. His experience includes failure analysis, fire engineering, hazardous materials and operations, systems design and building codes, and accessibility consulting for commercial, residential, and infrastructure projects in North America, Europe, Asia, and the Middle East. Nate specializes in fire life safety systems and approaches used in academic buildings and campuses, assembly and performance venues, cultural heritage facilities, historic structures, institutional facilities, laboratories, multi-family dwellings, and tall buildings.

### Experience

- | Simpson Gumpertz & Heger Inc. (SGH). From 2016 to present.
- | Exponent. From 2011 to 2016.
- | Arup. From 2003 to 2011.
- | RJA Group. From 1997 to 2003.
- | Auburn Fire Department. From 1994 to 1997.
- | Worcester Polytechnic Institute. From 1995 to 1997.

### Airports and ground transportation

Accessibility compliance, integration of security requirements with means of egress for large populations, smoke and air movement in below-ground tunnels, terminal spaces and stations, zoned notification, and means of egress:

- | **Burbank Airport, Hangar Renovation, Burbank, CA**
- | **Confidential Prototype Fixed Guideway Transportation System, CA and NV**
- | **Emirates International Lounge, Los Angeles, CA**
- | **John Wayne Airport, Security Retrofit, Santa Ana, CA**
- | **John F. Kennedy Airport JetBlue Terminal, New York, NY**
- | **Los Angeles Airport, Automated People Mover, Los Angeles, CA**
- | **Los Angeles Airport, Central Utility Plan, Los Angeles, CA**
- | **Los Angeles Airport, ConRAC Facility, Los Angeles, CA**
- | **Los Angeles Airport, Terminal 7/8 Renovation and Expansion, Los Angeles, CA**
- | **Los Angeles Airport, Security Retrofit, Los Angeles, CA**
- | **Los Angeles Union Station Master Plan, Los Angeles, CA**
- | **Ninoy Aquino International Airport, Terminal 3, Manila, Philippines**
- | **San Luis Land Port of Entry, San Luis, AZ**
- | **Southwestern Yard, Los Angeles, CA**
- | **Westside Purple Line Extension Maintenance Facility, Division 20, Los Angeles, CA**
- | **Port Authority Trans-Hudson (PATH), World Trade Center Station, New York, NY**

## Archival, data, and information infrastructure

Accessibility compliance, alternative suppression systems, fire alarm and notification, fire and materials, flammability of materials, fuel storage, generator reliability, integrated security and fire systems, smoke control, stack systems, and very early smoke detection:

- ▮ **AT&T/Quest Telephone Exchange Facility, Phoenix, AZ**
- ▮ **Confidential Cloud Data Center, San Jose, CA**
- ▮ **Pasadena Central Library Renovation, Pasadena, CA**
- ▮ **University of Utah, Marriott Library, Salt Lake City, UT**
- ▮ **University of California, Los Angeles (UCLA), Southern Regional Library Facility, Los Angeles, CA**
- ▮ **Woodbury University, Library Renovation, Burbank, CA**

## Assembly and performing arts

Accessibility compliance, assembly means of egress optimization, compartmentation considerations, fire detection and alarm, fireproofing, fire sprinkler systems, interior finish, proscenium protection, scenery protection, acoustic systems integration, smoke control (exhaust and venting), zoned egress:

- ▮ **Anaheim Convention Center, Anaheim, CA**
- ▮ **Crypto.com Arena, Los Angeles, CA**
- ▮ **Fashion Show Mall, Las Vegas, CA**
- ▮ **Facebook Event Center, Menlo Park, CA**
- ▮ **Harrah's Chester Downs Casino and Racetrack, Chester, PA**
- ▮ **Hollywood Athletic Club, Los Angeles, CA**
- ▮ **Idyllwild Arts Academy, Performing Arts Center, Idyllwild, CA**
- ▮ **Jack's Urban Meeting Place, Boise, ID**
- ▮ **Kirk Douglas Theater, Culver City, CA**
- ▮ **Kodak Theater, Los Angeles, CA**
- ▮ **MGM Mansion, Las Vegas, NV**
- ▮ **NFL Stadium Structural Fire Engineering, Inglewood, CA**
- ▮ **Pala Casino Expansion, Temecula, CA**
- ▮ **Project 115 Theme Park, Tianjin, China**
- ▮ **Segerstrom Center for the Arts at OCPAC, Costa Mesa, CA**
- ▮ **Skirball Cultural Center, Los Angeles, CA**
- ▮ **SoFi Stadium, Los Angeles, CA**
- ▮ **Staples Center, Los Angeles, CA**
- ▮ **Tempe Center for the Arts, Tempe, AZ**
- ▮ **Tropicana Casino and Resort, Las Vegas, CA**
- ▮ **Universal City Walk, Universal City, CA**
- ▮ **University of La Verne, Sports Science and Athletics Pavilion, La Verne, CA**
- ▮ **Venetian Macau, Macau SAR, China**
- ▮ **Walt Disney Concert Hall, Los Angeles, CA**

**I Wynn Encore, Las Vegas, NV**

**I Wynn Resort, Macau SAR, China**

## **Creative office**

Accessibility compliance, means of egress, construction type analysis, smoke control, interior finish studies, art installations, fire protection systems design:

**I Apple Inc., Culver City Office Building, Culver City, CA**

**I Culver Studios (Multiple Buildings), Culver City, CA**

**I Directors Guild of America, Los Angeles, CA**

**I Facebook, West Campus (Various Buildings), Menlo Park, CA**

**I Facebook, Dumbarton, Fremont, CA**

**I Facebook, Burlingame Campus, Burlingame, CA**

**I Facebook, Menlo Park (Buildings 20, 21, 22, 27, 28, 61,62, 63), Menlo Park, CA**

**I Facebook, Los Angeles Airport, Los Angeles, CA**

**I Meta (Facebook), Windsurfer Campus, Menlo Park, CA**

**I Ivy Station, Culver City, CA**

**I MU11, Inglewood, CA**

**I Netflix Animation Studios, Burbank, CA**

**I Netflix, ICON and CUE Creative Office Buildings, Los Angeles, CA**

**I Netflix, Serrano Office Building, Los Angeles, CA**

**I Nissan/Infiniti, Downtown Los Angeles, Los Angeles, CA**

**I Pier 70, Office Building Adaptive Reuse, San Francisco, CA**

**I Press Mixed-Use Office Buildings, Costa Mesa, CA**

**I Santa Monica Airport, Office Building Adaptive Reuse, Santa Monica, CA**

**I Santa Monica Post Office, Adaptive Reuse, Santa Monica, CA**

**I Second Century Complex, Burbank, CA**

**I Sunset Bronson Studios, Historic Renovation, Los Angeles, CA**

**I The Culver Studios, Culver City, CA**

**I The French Market, West Hollywood, CA**

**I The Lane Building, Los Angeles, CA**

**I Water's Edge 3, Los Angeles, CA**

## **Cultural resource facilities**

Accessibility compliance, compartmentation, high-value contents, fire suppression in sensitive spaces, occupant movement and means of egress, smoke control (exhaust method), system reliability, and very early smoke detection:

**I 830 South Flower Street, Historic Renovation, Los Angeles, CA**

**I Academy Museum of Motion Pictures, Arts, and Sciences, Los Angeles, CA**

**I Asian Art Museum, Renovation and Addition, San Francisco, CA**

**I Budokan Community Center, Los Angeles, CA**

**I California Academy of Sciences, San Francisco, CA**

- | California Museum of Science & Industry, Los Angeles, CA
- | Children's Museum of Los Angeles, Los Angeles, CA
- | Christ and St. Luke's Church, Norfolk, VA
- | Fresno Metropolitan Museum, Fresno, CA
- | Garfield Building, Los Angeles, CA
- | Getty Center Museum, Los Angeles, CA
- | Glendale Central Library, Glendale, CA
- | Griffith Observatory Renovation, Los Angeles, CA
- | Guggenheim Abu Dhabi, United Arab Emirates
- | Hammer Museum (Various Renovations), Los Angeles, CA
- | Idyllwild Performing Arts Center, Idyllwild, CA
- | John Chamberlain Building, Oak Street, Marfa, TX
- | Los Angeles County Museum of Art, Building for Permanent Collection, Los Angeles, CA
- | Los Angeles County Museum of Art, Broad Contemporary Art Museum, Los Angeles, CA
- | Los Angeles County Museum of Contemporary Art (MOCA), Geffen Contemporary Renovation Study, Los Angeles, CA
- | Los Angeles County Museum of Art East and West, Los Angeles, CA
- | Los Angeles Mikvah Society, Los Angeles, CA
- | L. Ron Hubbard Hall, Clearwater, FL
- | Lucas Museum of Narrative Art, Los Angeles, CA
- | Luxury Residential Condo Tower, Henderson, NV
- | Mariposa Lilly Affordable Housing, Los Angeles, CA
- | Museo Soumaya, Mexico City, Mexico
- | National Palace Museum, Taipei, Taiwan
- | Orange County Museum of Art, Costa Mesa, CA
- | Pershing Square Renovation Study, Los Angeles, CA
- | Resnick Campus and Synagogue, Los Angeles, CA
- | Shanghai Scienceland Museum, Shanghai, China
- | Timken Museum of Art, Expansion Project, San Diego, CA

## Educational

Accessibility compliance, dormitory fire protection, fire access, fire construction assemblies, hazardous materials management, means of egress, hazardous materials management, fire protection systems, and smoke control systems:

- | Art Center College of Design, Mullin Transportation Design Center, Pasadena, CA
- | Art Center College of Design, Miscellaneous Buildings, Pasadena, CA
- | California Institute of Technology, Jet Propulsion Laboratory, Pasadena, CA
- | California State University, Channel Islands Gateway Hall, Camarillo, CA
- | California State University, Long Beach, FA1, UTC, and Library, Long Beach, CA
- | California State University, Long Beach Science II Building, Long Beach, CA
- | California Institute of Technology, Walter and Leonore Annenberg Center, Pasadena, CA

- | Center for Early Education, Alternative Means and Methods and Fire Access, West Hollywood, CA
- | Colburn School, Student Housing, Los Angeles, CA
- | Community College of Southern Nevada, Science Classroom Building, Las Vegas, NV
- | The Cooper Union, Academic Building, New York, NY
- | California State University, Miscellaneous Buildings, Los Angeles, Northridge, and Camarillo, CA
- | Emerson College, Los Angeles Center, Los Angeles, CA
- | Los Angeles Unified School District, Miscellaneous Buildings, Los Angeles, CA
- | Los Angeles Unified School District, Graham Elementary School, Los Angeles, CA
- | Los Angeles Unified School District, Paul Revere Charter Middle School, Los Angeles, CA
- | Marlborough School Renovations, Los Angeles, CA
- | Case Western Reserve University, Peter B. Lewis Weatherhead School of Management, Cleveland, OH
- | Pomona College, Biology Building/Seaver South Renovation, Pomona, CA
- | Santa Monica College, KCRW Facility, Santa Monica, CA
- | Soka University of America, Multiple Buildings, Aliso Viejo, CA
- | Stanford Research Institute, Menlo Park, CA
- | Whittier College, Stauffer Science Center, Whittier, CA
- | University of California, Berkeley, Gateway, Berkeley, CA
- | UCLA, Basketball Practice Facility, Los Angeles, CA
- | UCLA, Broad Art Center, Los Angeles, CA
- | UCLA, Big Ten Network Study, Los Angeles, CA
- | UCLA, Biomedical Sciences Research Building (SRB2), Los Angeles, CA
- | UCLA, Easton Stadium Master Plan, Los Angeles, CA
- | UCLA, Landfair & Glenrock Housing Complex, Los Angeles, CA
- | UCLA, Margan Apartments, Los Angeles, CA
- | UCLA, Murphey Hall, Los Angeles, CA
- | UCLA, Music Facility, Los Angeles, CA
- | UCLA, Northwest Housing Complex, Los Angeles, CA
- | UCLA, Ostin Music Center Addition, Los Angeles, CA
- | UCLA, Southwest Housing Complex, Los Angeles, CA
- | UCLA, Wooden Recreation and Sports Center Renovation, Los Angeles, CA
- | University of California San Diego, Canyon Vista Marketplace, San Diego, CA
- | University of California Santa Cruz, Kresge College Academic Building, Santa Cruz, CA
- | University of Nevada, Las Vegas Science, Engineering & Technology Building, Las Vegas, NV
- | University of South Florida, Judy Genshaft Honors College Building, Tampa, FL
- | University of Texas, Performance Hall at the Arts & Performance Complex, Dallas, TX
- | University of Utah, Marriott Library Renovation, Salt Lake City, UT
- | University of South Florida, Judy Genshaft Honors College, Tampa, FL
- | Woodbury University, Architecture Studio, Burbank, CA

## Energy infrastructure

Accessibility compliance, explosion prevention, fire exposure analysis, flammable and combustible liquids storage, flammable and explosive gas protection, manual suppression:

- **Carson Oil Well Study, Torrance, CA**
- **Metro Division 16, Rail Maintenance Building, Los Angeles, CA**
- **Metro Division 20, Rail Maintenance Building, Los Angeles, CA**
- **Miscellaneous Oil Well Exposure Studies, Brea, Huntington Beach, and Long Beach, CA**
- **PXP Mass Notification Assessment, Los Angeles, CA**
- **Recology Recycling Facility, Los Angeles, CA**
- **Confidential Battery Manufacturing Facility**

## Health care

Accessibility compliance, compartmentation and fire resistive construction strategies, Joint Commission on Accreditation of Healthcare Organizations (JCAHO) accreditation and National Fire Protection Association (NFPA) 101 compliance, means of egress, Office of Statewide Health Planning and Development (OSHPD) 1, 2, and 3 implementation, and suite design:

- **Cedars Sinai, Tenant Improvements for Miscellaneous Buildings, Los Angeles, CA**
- **Good Samaritan, Medical Office Building, Los Angeles, CA**
- **Kaiser Foundation Hospital, Panorama City Medical Center, Panorama City, CA**
- **Kaiser Permanente, Sand Canyon Central Plant, Irvine, CA**
- **Momentum Innovative Disability Services, Chatsworth, CA**
- **Placer County, Health and Human Services Center, CA**
- **Quest Diagnostics Facility, Valencia, CA**
- **Quest Diagnostics Laboratory, San Juan Capistrano, CA**
- **St. Joseph Hospital, Medical Office Building, Orange, CA**
- **St. Jude Hospital, Los Angeles, CA**
- **U.S. Department of Veterans Affairs, CA**
- **U.S. Vets, West Los Angeles Veterans Administration Campus, Building 300, Los Angeles, CA**
- **West Los Angeles Veterans Administration Campus, Building 300, Los Angeles, CA**
- **West Los Angeles Veterans Administration Campus, Building 210, Los Angeles, CA**
- **West Los Angeles Veterans Administration, Campus Housing Development, Los Angeles, CA**
- **Yorba Linda Clinic, Yorba Linda, CA**

## High-rise commercial, residential, and hotel

Accessibility compliance, design, and implementation of high-rise building systems and approaches, including smoke control, means of egress, fire safety systems, structural fire engineering, and alternative means and methods approaches:

- **1527 Lincoln Boulevard, Santa Monica, CA**
- **1801 Santa Monica Boulevard, Santa Monica, CA**
- **1819 Santa Monica Boulevard, Santa Monica, CA**
- **3030 Nebraska Avenue, Parcels 1A, 2A, 3, and 3A, Santa Monica, CA**
- **3122 Nebraska Avenue + 1832 Franklin Street, Santa Monica, CA**
- **3700 Wilshire Boulevard, Los Angeles, CA**

- | 8300 Sunset Boulevard, Los Angeles, CA
- | 801 S Broadway Renovation, Los Angeles, CA
- | 1120 S Grand South Park (AVEN), Los Angeles, CA
- | 3033 Wilshire, Los Angeles, CA
- | Al Dana at Raha Beach, Abu Dhabi, United Arab Emirates
- | Amazon LAX35, Building J, Culver City, CA
- | Anchorage Marriott, Anchorage, AK
- | Barrington Plaza, Los Angeles, CA
- | Burbank Studios Office Buildings, Burbank, CA
- | California Natural Resources Headquarters, Sacramento, CA
- | Caltrans, District 7 Headquarters Building, Los Angeles, CA
- | Coliseum Mixed-Use Development, Los Angeles, CA
- | Confidential Resort Hotel, Aspen, CO
- | Cook County Administration Building, Chicago, IL
- | The Grand LA (Parcel Q), Los Angeles, CA
- | Gayley at Wilshire Residential High Rise, Los Angeles, CA
- | Grand Californian Hotel, Anaheim, CA
- | Hilton Canopy Sacramento, Sacramento, CA
- | Hollywood and Highland Marriott Renaissance Hotel, Hollywood, CA
- | Housing Bank of Trade and Finance, Amman, Jordan
- | Horizons Luxury Condominiums, San Diego, CA
- | Lost Spirits Distillery at Area15, Las Vegas, NV
- | Marina Tower, Abu Dhabi, United Arab Emirates
- | Metropolis Residential & Hotel Towers (Phases 1 and 2), Los Angeles, CA
- | Natural Resources Headquarters Building, Sacramento, CA
- | NFL Studio and Office Building, Inglewood, CA
- | Nissan Downtown Los Angeles, Sales and Maintenance Facility, Los Angeles, CA
- | Orange Station Boutique Hotel, Saint Petersburg, FL
- | Pacific Design Center Red Building, West Hollywood, CA
- | Park Place Luxury Condominiums, Irvine, CA
- | Relativity Space Inc., Building 2, Long Beach, CA
- | Riviera Hotel and Casino Crocus City, Moscow, Russia
- | Sacramento Hilton Canopy, Sacramento, CA
- | Salesforce Tower, Door Fireproofing Monitoring, San Francisco, CA
- | San Francisco Design Center, San Francisco, CA
- | San Jose City Hall and Civic Center, San Jose, CA
- | Sienna Hotel & Casino, Reno NV
- | Sony Office Building, Culver City, CA

- I South Coast Plaza, Costa Mesa, CA**
- I Sunset Bronson ICON tower (Netflix), Los Angeles, CA**
- I Tributary Clubhouse, Driggs, ID**
- I Pendry Hotel, West Hollywood, CA**
- I The Press, Costa Mesa, CA**
- I The Shores Santa Monica Apartments at the Beach, Santa Monica, CA**
- I Torre Reforma, Mexico City, Mexico**
- I Torre Quadrata, Mexico City, Mexico**
- I Vermont Corridor Site 2, Los Angeles, CA**
- I Wilshire Crescent Heights Mixed-Use, Los Angeles, CA**
- I Wilshire Grand Center, Los Angeles, CA**
- I Wilshire La Jolla Residential High-Rise, Los Angeles, CA**
- I Wilshire Vermont Mixed-Use Development, Los Angeles, CA**
- I Wolf Valley Town Center, Temecula, CA**
- I (W)rapper Office Building, Los Angeles, CA**

## Litigation support

Experience with litigation support inclusive of arbitration, deposition, and trial testimony. Accessibility compliance, fire life safety-focused litigation related to accessibility noncompliance, building defects analysis, origin and cause investigation, and injury and systems failure analysis:

- I Wildland Fire Science and Code Litigation Support Services**

## Science and technology

Accessibility compliance, fire protection systems specification, fire-resistive construction, hazardous materials management, hazardous processes, passive barrier optimization:

- I 41 Cooper Square Laboratory and Classroom Building, New York, NY**
- I California Air Resources Board, Testing and Research Facility, Riverside, CA**
- I Confidential Laboratory Buildings for Artificial Intelligence Research and Defense Light Manufacturing, CA, and WA**
- I Keysight Technologies, Fabrication Facility Risk Assessment, Santa Rosa, CA**
- I Jet Propulsion Laboratory, Miscellaneous Structures, Pasadena, CA**
- I J. Vernon Luck Science Building, Los Angeles, CA**
- I Lawrence Berkley Livermore National Laboratory, Miscellaneous Buildings, Berkely, CA**
- I UCLA, Semel Nexus Renovation Study, Los Angeles, CA**
- I University of Nevada Science, Engineering & Technology Building, Las Vegas, NV**

## Secure facilities

Accessibility compliance, integration of life safety with security, fire barrier implementation, high-rise requirements, means of egress analysis, and smoke control (pressurization and exhaust):

- I Los Angeles U.S. Federal Courthouse, Los Angeles, CA**
- I New Madera Courthouse, Madera, CA**
- I New U.S. Embassy, Riyadh, Saudi Arabia**
- I Olympic Police Facility, Los Angeles, CA**

- ▮ **Ontario Town Center, A, Ontario, CA**
- ▮ **Riverside District Attorney's Office, Riverside, CA**
- ▮ **San Jose City Hall and Civic Center, San Jose, CA**
- ▮ **U.S. Land Port of Entry, Modernization and Expansion, Champlain, NY**
- ▮ **U.S. Land Port of Entry, Modernization and Expansion, Otay Mesa, CA**
- ▮ **U.S. Embassy in London (Competition), London, UK**
- ▮ **U.S. Embassy in Beirut, Lebanon**
- ▮ **U.S. Embassy in Riyadh, Saudi Arabia**

## Sound stage, production office, mill, and studio complexes

Accessibility compliance, consulting for studio complex designs that require unique approaches to means of egress design, fire life safety systems, and accessibility based on requirements derived from the California Building and Fire Codes as well as related National Fire Protection Association standards. These facilities must be flexible and cost-effective while meeting rigorous standards of safety and operator standards:

- ▮ **CBS Television Studios, Los Angeles, CA**
- ▮ **Cinespace Catalina Project, Woodland Hills, CA**
- ▮ **Confidential Studio Complex, Santa Clarita, CA**
- ▮ **Confidential Studio Complex, Burbank, CA**
- ▮ **Manhattan Beach Studios, Manhattan Beach, CA**
- ▮ **Miscellaneous Sound Stage Renovations, Los Angeles, CA**
- ▮ **Sunset Gower Studios, Los Angeles, CA**
- ▮ **Sunset Las Palmas Studios, Los Angeles, CA**
- ▮ **Sony Pictures Studios, Culver City, CA**
- ▮ **Universal Studios, Universal City, CA**
- ▮ **Warner Bros, Burbank, CA**

## Recent expert witness and/or litigation support cases

- ▮ **Lola Hill, Guardian of William Morris, Jr. v. DJK Enterprises, Inc., et al.**
  - ▮ Case No.: CJ-14-120
  - ▮ District Court of Pontotoc County, State of Oklahoma
  - ▮ Expert Witness Deposition Date: 30 June 2016
- ▮ **Wilshire Vermont Housing Partners, L.P. v. Taisei Construction Co., et al.**
  - ▮ Case No.: BC504178
  - ▮ Superior Court of the State of California for the County of Los Angeles
  - ▮ Trial Date: 17 May 2016
  - ▮ Expert Witness Depositions (multiple dates)
- ▮ **People of the State of California v. Wilshire Vermont, et al.**
  - ▮ Case No.: 9CJ01162
  - ▮ Superior Court of the State of California for the County of Los Angeles
  - ▮ Expert Witness Depositions (multiple dates)
- ▮ **Avril Gerscovich (minor) v. Douglas Emmett, Inc., et al.**

- | Case No.: BC532451
- | Superior Court of the State of California for the County of Los Angeles
- | Expert Witness Deposition Date: 15 November 2016
- | Testimony at trial

**| Tubbs Fire and PG&E Corporation (Chapter 11)**

- | Case No.: 19-30088
- | United States Bankruptcy Court, Northern District of California
- | Related to the October 2017 Tubbs Fire
- | No Expert Witness Deposition

**| Barrington Plaza Tenant Association v. Douglas Emmett, Inc. and Barrington Pacific, LLC**

- | Case No.: 23STCV13323 (Lead Case)
- | Superior Court of the State of California for the County of Los Angeles
- | Trial Date: 15 April 2024

**| McGuire Builders, Inc. v. Case Owner, LLC, et al.**

- | Case No.: 1220071184 (JAMS Arbitration – Los Angeles)
- | No Expert Witness Deposition or Trial at this time
- | Ongoing

**General Note: Ongoing work related to notices of alleged defects and commencement of contractual dispute resolutions in Arizona and California**

## Honors and awards

- | Commendation by the Chief of the Auburn Fire Department
- | UCLA Extension Architecture + Interior Design Instructor of the Year, 2013
- | *Consulting – Specifying Engineer Magazine*, “40 under 40” Award, 2009
- | Best Technical Paper in Conference, “Submersible Oil Well Study,” *Proceedings of the Third International Conference on Fire Research and Engineering*, October 1999
- | Salamander Honorary Fire Protection Engineering Society
- | Tau Beta Pi Engineering Honor Society
- | Chi Epsilon Engineering Honor Society
- | Skull Senior Honor Society

## Professional activities

- | Council on Tall Buildings and Urban Habitat (CTBUH): Fire Safety Committee.
- | International Code Council (ICC): Member.
- | National Fire Protection Association (NFPA): Member.
- | NFPA 101 Technical Committee on Fire Protection Features: Chair.
- | NFPA 5000 Technical Committee on Fire Protection Features: Chair.
- | National Association of Fire Investigators (NAFI): Member.
- | Society of Fire Protection Engineers (SFPE): Professional Member.
- | Tall Building Fire Safety Network: Member.

## Presentations

- **Wittasek, N.B.**, "Time and the Tall Building – Time Saving Technologies that Preserve Lives and Enhance Safety in Recently Constructed Tall Buildings," presentation at the Third International Tall Building Fire Safety Conference, London, U.K, July 2015.
- **Wittasek, N.B.**, "Tall Building Life Safety Systems: An Engineering Perspective of Key Challenges," presentation at 2nd International Tall Building Fire Safety Conference, London, U.K, June 2014.
- **Wittasek, N.B.**, "Navigating the Complexities of Accessibility in Existing Buildings," presentation for AIA | LA Continuing Education Series, Los Angeles, CA, March 2012.
- **Wittasek, N.B.**, "The 2010 CBC & ADA Accessibility in Existing Buildings," presentation for AIA | LA Continuing Education Series, Los Angeles, CA, September 2011.
- **Wittasek, N.B.**, "It's Your Time and Money – Accessibility Errors and Omissions," presentation at Mobius LA, Los Angeles, CA, June 2010.
- **Wittasek, N.B.**, "Simulating Building Evacuation Using an Agent-Based Approach," presentation at Human Behaviour in Fires Symposium, Cambridge, UK, July 2009.
- **Wittasek, N.B.**, "Accessibility from the Outside In," presentation for AIA Continuing Education Series, Los Angeles, CA, September 2009.
- **Wittasek, N.B.**, "Accessibility in New and Existing Assembly Occupancies: From the Front to the Back of House," presentation for AIA Continuing Education Series, Los Angeles, CA, January 2009.
- **Wittasek, N.B.**, "Accessibility in New Retail Establishments: Walking through your Friendly Neighborhood Shops," presentation for AIA Continuing Education Series, Los Angeles, CA, January 2009.
- **Wittasek, N.B.**, "Provisions of the 2007 CBC that Cause the Most Confusion," presentation at Mobius LA, Los Angeles, CA, 2008.
- **Wittasek, N.B.**, "Heat," presentation at Pasadena Art Center College of Design, Pasadena, CA, 2008.
- **Wittasek, N.B.**, "Building Codes and Design," presentation at Sci-Arc, Los Angeles, CA, 2007, 2008, and 2016.
- **Wittasek, N.B.**, "Sustainable Development in the United Arab Emirates," presentation at University of Southern California Los Angeles, CA, 2008.

## Books

- **Wittasek, N.B. and J. Gentile**, *Interactive Guide to the 2012 International Building Code, an Illustrated Checklist*, International Code Council, 2013.
- **Wittasek, N.B., J. Tubbs, and B. Meacham**, *Egress Design Solutions: A Guide to Evacuation and Crowd Management Planning*, John Wiley & Sons, 2007.

## Publications

- **Wittasek, N.B., and K.M. Black**, "Choosing Active and Passive Fire Protection Systems," *Consulting-Specifying Engineer*, May 2021.
- **Wittasek, N.B.**, "Best Practices for Design Smoke Control Systems," *Consulting-Specifying Engineer*, May 2020.
- **Wittasek, N.B. and K.J. LaMalva**, "New Standardization for Structural Fire Protection Variances," *Building Safety Journal*, May 2020.
- **Wittasek, N.B.**, "Common Smoke Control Approaches in High-Rise Buildings," *Consulting-Specifying Engineer*, May 2019.
- **Wittasek, N.B.**, "Challenges with Tall Building Design: Are we Creating Risk by Introducing Unnecessary Complexity?," *Proceedings of the 2nd International Tall Building Fire Safety Conference*, 17-20 June 2014.
- **Wittasek, N.B. and D. Jacoby**, "New Fire Alarms for Old Buildings," *Consulting Specifying Engineer*, 15 February 2010.
- **Wittasek, N.B.**, "Model Behaviour," *The Economist Technology Quarterly*, 7 March 2009.
- **Wittasek, N.B., and D. Gemeny**, "Fire Test Data for Design Firms – A Perspective from One Practitioner," *ASTM's Role in Performance-Based Fire Codes and Standards, ASTM STP 137*, November 1999: 47-57.

- | **Wittasek, N.B.**, "Life Safety Considerations in the Health Care Environment," *ASHRAE Technical Forum*, 2003.
- | **Wittasek, N.B. and J. Tubbs**, "Submersible Oil Well Study," *Proceedings of the 3rd International Conference on Fire Research and Engineering*, October 1999.
- | **Wittasek, N.B., R.D. Pehrson, and J.R. Barnett**, "Computational Fluid Dynamics Modeling of Post-Crash Vehicle Fires," *General Motors Corporation*, Docket No. NHTSA-1998-3588-209, May 1997.
- | **Wittasek, N.B.**, "Analysis and Comparison of Marine Fire Testing Regulations and Procedures," *M.S. Thesis*, Worcester Polytechnic Institute, 1996.

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)

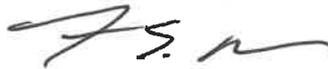
The City, as the Lead Agency under CEQA, failed to meet its burden under CEQA to allow for informed decision-making. “CEQA’s demand for meaningful information is not satisfied by simply stating information will be provided in the future.”<sup>18</sup> The Project is defined as the Specific Plan, which 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.