



Otay Mesa Planning Group

Established by the
City of San Diego
February 21, 1990
Resolution #90-018

April 30, 2026

Attn: San Diego Planning Commission
City of San Diego
202 C Street, 7th Floor
San Diego, CA 9210

**RE: OTAY MESA COMMUNITY PLANNING GROUP (OMCPG) RECOMMENDATION
OF APPROVAL – SOUTHWEST VILLAGE SPECIFIC PLAN**

Dear Honorable Commissioners:

On behalf of the Otay Mesa Community Planning Group (OMCPG), I am writing to formally convey the OMCPG recommendation of approval for the Southwest Village Specific Plan.

The OMCPG voted on June 18, 2025, to unanimously recommend approval of the current Southwest Village Specific Plan to the Planning Commission and City Council. This action reflects nearly a dozen updates to our OMCPG over years, including two years as a standing agenda item open for sustained Planning Group and public engagement, technical review, and consistent OMCPG insight.

As you are aware, Otay Mesa Community Planning Group (OMCPG) is an advisory body to the City of San Diego on planning issues within Otay Mesa Community Planning Area. The Southwest Village Subcommittee was formed in 2018 by the OMCPG and consisted of five community members. Subcommittee meetings were held regularly and provided opportunities for key stakeholders, interested members of the public, and community organizations to learn more about plans for Southwest Village, share insights, and provide feedback, including to the OMCPG.

The Southwest Village Subcommittee was established in 2018 and conducted a comprehensive public planning process, holding 15 publicly noticed meetings between May 2018 and December 2019. These meetings addressed land use, housing and density, design and placemaking, the Village Core and commercial uses, parks and public spaces, schools, connectivity and mobility, utilities and resources, and implementation. On January 15, 2020, the Southwest Village Subcommittee

Planning Group
meetings are held on
the 3rd Wednesday
of every month at
Virtually via [Zoom](#)



Otay Mesa Planning Group

Established by the
City of San Diego
February 21, 1990
Resolution #90-018

provided a unanimous recommendation of approval of the current draft Southwest Village Specific Plan. The Southwest Village Specific Plan underwent a full environmental review.

The Subcommittee recommendation was taken into consideration by the OMCPG, as was the overall Southwest Village Specific Plan. Importantly, there were no speakers in opposition at any of the OMCPG meetings at which the Southwest Village Specific Plan was discussed, reflecting strong and sustained community support.

The Southwest Village Specific Plan represents a critical component of the Otay Mesa Community Plan and advances the City's vision for a complete, sustainable, and transit-supportive community. The 500-acre plan is thoughtfully designed as a compact, mixed-use village integrating much needed housing, jobs, and public amenities. Key elements include a mixed-use Village Core, approximately 175,000 square feet of commercial uses, new housing opportunities at more than 5,000 planned units, approximately 35 acres of public/private owned interconnected parks, a future school site, preserved open space, and a multi-modal circulation network that supports walkability and connectivity.

The Southwest Village has remained a standing agenda item for OMCPG for several years, underscoring its importance as one of the City's last remaining large undeveloped planning areas. The OMCPG and community are eager to see this long-envisioned village realized.

Based on the extensive public process, unanimous OMPG action, and clear community support, the Otay Mesa Community Planning Group strongly urges the Planning Commission to approve the Southwest Village Specific Plan without delay.

Sincerely,

Rob Hixson
Chair, Otay Mesa Community Planning Group

Planning Group
meetings are held on
the 3rd Wednesday
of every month at
Virtually via [Zoom](#)



T 510.836.4200
F 510.836.4205

1939 Harrison Street, Ste. 150
Oakland, CA 94612

www.lozeaudrury.com
victoria@lozeaudrury.com

Via Webform¹

May 6, 2026

Kelly Modén, Chairperson
Matthew Boomhower, Vice-Chairperson
Ted Miyahara, Commissioner
Farah Mahzari, Commissioner
Daniel Reeves, Commissioner
Ken Malbrough, Commissioner
Jeana Renger, Commissioner
Planning Commission
City of San Diego
7650 Mission Valley Road,
San Diego, California 92108

Oscar Galvez, Development Project Manager
Development Services Department
City of San Diego
1222 First Avenue
San Diego, CA 92108
GalvezO@sandiego.gov

Re: Comment on the Final Subsequent Environmental Impact Report for the Southwest Specific Plan Project (PRJ # 0614791), May 7, 2026 City of San Diego Planning Commission Agenda Item 1

Dear Chairperson Modén, Vice-Chairperson Boomhower, Honorable Planning Commissioners, and Mr. Galvez:

This comment is submitted on behalf of Supporters Alliance for Environmental Responsibility (“SAFER”) regarding the Final Subsequent Environmental Impact Report No. 0614791/SCH No. 2004051076 (“FSEIR” or “SEIR”) for the Southwest Village Specific Plan Project (PRJ # 0614791), including all actions referring or related to the proposed development of a 490-acre specific plan consisting of 5,130 residential units, 175,000 square feet of commercial space, 31.5 acres of parks and open space, and supporting infrastructure, located in San Diego, California (“Project”). The Project is scheduled to be heard as Agenda Item 1 at the City of San Diego (“City”) Planning Commission’s May 7, 2026 meeting.

SAFER is concerned that the SEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project’s impacts. Among other concerns, SAFER has identified the following issues:

1. A project will have a significant greenhouse gas (“GHG”) impact if it conflicts with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs. (CEQA Guidelines, App. G, § VIII.) Here, the SEIR concludes

¹ <https://www.sandiego.gov/planning-commission/agenda-comment-form>

May 6, 2026

Comment on Final EIR, Southwest Village Specific Plan Project

San Diego Planning Commission Agenda Item 1

Page 2 of 5

that the Project will have a less than significant GHG impact and includes no mitigation measures to reduce GHG emissions. However, after reviewing the SEIR, SAFER found that the Project conflicts with the California Air Resources Board's 2022 Scoping Plan for Achieving Carbon Neutrality ("2022 Scoping Plan"), which identifies strategies for achieving California's long-term climate goal of carbon neutrality by 2045 or earlier. SAFER also found that the Project conflicts with the City's 2022 Climate Action Plan ("CAP"), which establishes a community-wide goal of net zero emissions by 2035 and commits San Diego to an accelerated trajectory for reducing GHG emissions. An EIR must show how a project will conform to current statewide and regional GHG reduction targets and adopt enforceable mitigation to achieve these goals. (*Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 62 Cal.4th 204, 225-26; *League to Save Lake Tahoe v. County of Placer* (2022) 75 Cal.App.5th 63, 121-22.) As such, the Project's conflict with the 2022 Scoping Plan and CAP is a significant GHG impact that must be analyzed and mitigated in a revised SEIR.

Additionally, the SEIR concludes that the Project's GHG impacts will be less than significant without mitigation, even though the 2014 Otay Mesa Community Plan FEIR, from which the SEIR tiers, found that the Project would result in a significant and unavoidable GHG impact. However, the SEIR provides no justification for its updated less-than-significant GHG conclusion. As such, the SEIR lacks substantial evidence to conclude that the Project will not result in significant GHG impacts. In addition, the SEIR should be revised to include all feasible mitigation measures to reduce GHGs.

2. The SEIR fails to include all feasible mitigation measures to reduce the Project's significant and unavoidable vehicle miles traveled ("VMT") impacts. Instead, the SEIR only includes Mitigation Measure PR-TRA-1, which requires compliance with the City's Mobility Choices Program Regulations through payment of an Active Transportation In Lieu Fee (ATILF). Because the Project's VMT impact remains significant and unavoidable even with incorporation of MM PR-TRA-1, the City must require all feasible mitigation measures to reduce the impact to the extent possible prior to proceeding with the Project. (Pub. Res. Code §21081(a); 14 CCR §15091(a).) However, the EIR fails to demonstrate that the City considered the feasibility of additional measures beyond MM PR-TRA-1.

There is ample opportunity for the City to include further mitigation measures to reduce the Project's VMTs. For example, Appendix T of the City's Mobility Choices Regulations² provides numerous other reduction measures that could be applied to this Project, including:

- Installing electric bicycle charging stations/micro-mobility charging stations that are available to the public.

² https://www.sandiego.gov/sites/default/files/mobility_choices_appendix_t_6_15_2020.pdf

May 6, 2026

Comment on Final EIR, Southwest Village Specific Plan Project

San Diego Planning Commission Agenda Item 1

Page 3 of 5

- Providing short-term bicycle parking spaces that are available to the public, at least 10% beyond minimum requirements.
- Providing long-term bicycle parking spaces at least 10% beyond minimum requirements.
- Providing on-site designated micro-mobility (e.g. bicycles, Ebikes, electric scooters, shared bicycles, and electric pedal assisted bicycle) parking area that is available to the public.
- Installing pedestrian enhancing amenities at adjacent intersections (hardscape): Median refuges, raised crosswalks.

The City must consider whether additional VMT reduction measures from Appendix T, including but not limited to those listed above, are feasible for this Project. All feasible reduction measures must be applied to the Project before the City certifies the EIR. A revised Draft SEIR should be prepared and recirculated that includes all feasible mitigation to reduce the Project's VMT impacts.

3. Since the Project will have significant unmitigated impacts, the City must analyze whether the Project's economic benefits exceed its environmental impacts before adopting a statement of overriding considerations. (14 CCR §15043; Pub. Res. Code §21081(B); *Sierra Club v. Contra Costa County* (1992) 10 Cal.App.4th 1212, 1222.) Key among the findings that the lead agency must make is that:

“Specific economic, legal, social, technological, or other considerations, ***including the provision of employment opportunities for highly trained workers***, make infeasible the mitigation measures or alternatives identified in the environmental impact report...[and that those] benefits of the project outweigh the significant effects on the environment.”(Pub. Res. Code §21081(a)(3), (b).)

Thus, the City must analyze whether the Project provides “employment opportunities for highly trained workers.” The SEIR contains no such analysis.

4. SAFER also agrees with the expert findings of the Center for Biological Diversity (“CBD”), Endangered Habitats League (“EHL”), Sierra Club, and San Diego Bird Alliance (“SDBA”) regarding the Project's significant biological resources, GHG, VMT, land use, and cumulative impacts, among others. CBD, EHL, Sierra Club, and SDBA reviewed the Project and the Draft SEIR and prepared expert comments on the Draft SEIR, which were submitted on June 16, 2025, June 22, 2025 and June 23, 2025. CBD, EHL, Sierra Club, and SDBA's comments on the Draft SEIR also apply to the FSEIR. SAFER adopts by reference all comments filed by CBD, EHL, Sierra Club, and SDBA in this matter.

CBD, EHL, Sierra Club, and SDBA concluded that the SEIR failed to adequately analyze and mitigate the Project's biological resources, GHG, VMT, land use, and

May 6, 2026

Comment on Final EIR, Southwest Village Specific Plan Project

San Diego Planning Commission Agenda Item 1

Page 4 of 5

cumulative impacts, among others. Specifically, CBD, EHL, Sierra Club, and SDBA found, *inter alia*, that:

- a. The SEIR fails to analyze and mitigate the Project's significant impacts to wildlife connectivity, especially impacts from the Beyer Boulevard extension.
- b. The SEIR's mitigation for vernal pool impacts is inadequate.
- c. The SEIR fails to include all feasible mitigation measures to reduce impacts special-status protected under the MSCP.
- d. The SEIR includes inadequate and improperly deferred brush management mitigation to reduce impacts to nesting birds. The City should adopt mitigation measures requiring all project landscaping trees and plants to be California native plants and all native habitats in biological/natural open space to be directly restored, including Diegan coastal sage scrub, native grasslands, and vernal pools.
- e. The SEIR fails to adequately analyze and mitigate impacts to special-status bird species.
- f. The SEIR fails to adequately mitigate impacts to birds and pollinators as a result of increased light pollution from the Project. To reduce these impacts, the City should adopt as mitigation: Dark Sky standards for lighting; commit to choosing warmer colors in the range of 2000 to 3000K for exterior lights while striving to minimize perimeter lighting; and require all lights to be shielded, face away from the MHPA, and be on a timer or motion-sensitive.
- g. The Project is inconsistent with the City's 2022 CAP and 2024 Blueprint SD Initiative as well as CARB's 2022 Scoping Plan.
- h. The SEIR fails to adequately analyze and mitigate the Project significant direct and cumulative GHG impacts.
- i. The SEIR fails to incorporate all feasible mitigation measures to reduce GHG emissions. Public comments recommend that all infrastructure on site should be electric. For example, solar systems and photovoltaic battery storage should be required to provide 100 percent of daily electricity usage; heat pumps should be utilized; and all project landscaping equipment should be electric.
- j. The SEIR underestimates VMT emissions and fails to include all feasible mitigation to reduce the Project's significant VMT impacts.
- k. The SEIR's analysis of land use impacts is inadequate.
- l. The Project is inconsistent with the City's General Plan.

In conclusion, SAFER requests that the Planning Commission deny approving this Project, and instead, direct staff to address these shortcomings in a revised Draft SEIR prior to considering approvals for the Project.

SAFER reserves the right to supplement these comments during the administrative process. (*Galante Vineyards v. Monterey Peninsula Water Management Dist.* (1997) 60 Cal.App.4th 1109, 1121.)

May 6, 2026

Comment on Final EIR, Southwest Village Specific Plan Project

San Diego Planning Commission Agenda Item 1

Page 5 of 5

Sincerely,

A handwritten signature in cursive script that reads "Victoria Yundt".

Victoria Yundt
Lozeau Drury LLP