

May 4, 2026

City of San Diego Planning Commission
7650 Mission Valley Road
San Diego, CA 92108

Re: Planning Commission May 7, 2026 Hearing, Agenda Item No. 1, Southwest Village Specific Plan Project (PRJ-0614791)

Dear Chair Kelly Moden and Planning Commissioners:

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 area, we are writing to express our strong concerns with the current draft of the Specific Plan and the CEQA analysis. We are hereby requesting (1) a continuance of this Planning Commission hearing to allow more time to work with the City and applicant to address our concerns, and, (2) if not possible, at a minimum, a minor, yet critical, revision to the Specific Plan regarding Beyer Boulevard West. Our proposed revision to the Specific Plan regarding Beyer Boulevard West is attached hereto as Exhibit 1.

This requested revision would clarify that the requirement to develop Beyer Boulevard West at the 700th dwelling unit only applies to the applicant’s development of Planning Areas 8-14 under its proposed Vesting Tentative Tract Map, which was analyzed at the project-level in the Subsequent Environmental Impact Report (“EIR”) for the Southwest Village Specific Plan Project (PRJ-0614791; State Clearinghouse No. 2004051076), and that the other Planning Areas will be subject to future project-level analysis. The other Planning Areas and respective property owners have not been consulted adequately or involved in any meaningful way in this Specific Plan process, and these other Planning Areas are only studied in the EIR preliminarily and at a program level. Our requested revision would ensure that once project-level details become available for these other Planning Areas, that they will be studied appropriately for infrastructure purposes, but not unnecessarily burdened with unknown obligations related to Beyer Boulevard West.

In addition, please note that we previously submitted three comment letters dated June 23, 2025, October 15, 2025 and February 20, 2026 that include technical expert evidence regarding a number of unaddressed deficiencies in the EIR. Our clients, BDM Twenty and Otay Mesa, have also made repeated requests to the City and applicant in a good faith effort to ascertain the facts and technical analysis on which the proposed phasing plan was based and to clarify the Specific Plan text regarding Beyer Boulevard West. The technical expert evidence we provided also demonstrated the properties owned by BDM Twenty and Otay Mesa do not need the extension of Beyer Boulevard West for traffic, circulation, safety, or fire response purposes. In addition, to date, we have not been provided any technical justification for the proposed phasing plan, and the draft Specific Plan is simply not ready for adoption.

In an email from Michael Prinz, Assistant Deputy Director, dated February 6, 2026, Mr. Prinz stated that “[t]he Phasing Plan proposed by the Applicant establishes that Beyer Boulevard West shall be constructed prior to the 700th unit by the Applicant”, and “[a]s 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.)*

In other words, the 700-unit trigger was selected by the applicant merely because the applicant did not want to spend the time studying anything beyond 700 units. However, the trigger for the construction of Beyer Boulevard West is a critical issue given the significant expense and complexity of developing such a roadway. Beyer Boulevard West should only be constructed when demand warrants it based on facts and technical analysis, which the City and the applicant have failed to provide. Requiring Beyer Boulevard West for other Planning Areas without project-level analysis confirming the need amounts to a de facto moratorium that prevents the production of critically needed housing.

Given the importance of this issue, and the fact that there has still not been a resolution among the landowners in the Specific Plan area, we urge the Planning Commission to continue the hearing to allow the parties to work together to find a fair and acceptable solution.

Thank you very much for your consideration of this request.

Sincerely,



Francis Y. Park
of PARK & VELAYOS LLP

cc: Mr. Christopher Ackerman-Avila, Senior Policy Advisor
Ms. Heidi Vonblum, City Planning Director
Mr. Oscar Galvez, Development Project Manager
Doctor Gerald Handler
Mr. Michael H. Shoemaker
Mr. William A. Spurgin
Mr. Gerald M. Whitehead
Ms. Marcela Escobar
Marcos D. Velayos, Esq.
Jennifer L. Erickson, Esq.

Exhibit 1
Proposed Specific Plan Revision

Note: Additions shown in blue underline and deletions shown in red strikethrough.

Draft Southwest Village Specific Plan (April 2026), Page 174, Section 7.13(g), as revised in the May 1, 2026 Memorandum from the Development Services Department to the Planning Commission:

Table 7.2, Phasing Summary, summarizes each of the phases of development. It is anticipated that the Specific Plan area will be developed in multiple phases over time due to the multiple property ownership. This Specific Plan does not require that phases occur in any special order. Phasing may occur in any order, and more than one phase may occur at one time, provided that the necessary infrastructure is in place or occurs concurrently as specified in each phase(s) of development. For example, as a requirement for VTM-1, Beyer Boulevard shall be extended to the west prior to the 700th dwelling unit in Phase 1 (Planning Areas 8-14). The need for Beyer Boulevard West for oOther Planning Areas will be subject to future project-level analysis ~~including as it relates to Beyer Boulevard West for necessary infrastructure, public facilities, and emergency access required at each phase of development.~~ *Figure 7.1*, Phasing illustrates the implementation of the Specific Plan by Planning Area.