



North County Group
Sierra Club San Diego
P.O. Box 2141
Escondido, CA 92033

March 1, 2019

Mayor and City Council
City of Escondido
Via Email

RE: Sierra Club NCG comments on 2019/2020 Escondido Action Plan

Dear Mayor McNamara and City Council Members,

Sierra Club North County Group is grateful the city has requested the input of the public for its biennial 2019-2020 Action Plan. We offer the comments and suggestions below to identify those actions of highest importance to our members and the environment.

A. Continue strong direction on the Climate Action Plan and Regional Transportation Plan

Sierra Club appreciates that the new Council understands the imperative we face as a society to take action on this issue and we strongly encourage the City to continue on its path to 'best ever' climate action. We have offered extensive comments on this issue prior.¹ Also, with the new Executive Director of SANDAG, Mr. Ikhrata, there is now an opportunity for a visionary transportation plan that can greatly enhance the economy and environment of our region and a commitment to develop it.

The energy picture is changing in our region rapidly, and for the better. Recent decisions by the city of San Diego and the County are a demonstration of how our region will meet our energy needs in the future. The analysis and development of a community choice program, which was stated direction of the Council, has a timeline related to it and should be prioritized in this action plan. The city should act to complete a feasibility analysis and make a determination by the end of the year in order to meet the deadline for this cycle.

In addition, we encourage the city to also adopt policies such as a composting ordinance and a polystyrene ban. Landfills are the third largest contributor to GHG emissions in the nation and such actions would significantly promote our values of sustainability.

Sierra Club also urges the adoption of green and sustainable building codes that go beyond "minimum" that will result in energy savings and GHG reductions be incorporated into the new Climate Update.

Please know we are ready to support the city in any way we are able to ensure that Escondido does its part to address, and reduce, the contributions to climate change.

B. Focus on development residents need and move away from projects that are devastating to habitat and the climate and a fiscal drain on the region.

We encourage the city to focus its efforts carefully in the next two years on the kind of projects it pursues. When it comes to housing, there is an important distinction that must be made regarding what

¹ https://sierraclubncg.org/wp-content/uploads/2018/11/NCG-CAP-and-Adaptation-Letter-to-Escondido_26_NOV2018.pdf

kind of housing and where is it located. Escondido's housing crisis is the need for affordable housing and housing that is affordable. Our housing stock is out of balance and the supply of reasonably housing for middle-income families is too low. We need to expand and diversify our housing options to create more local affordability. This is not limited to low-income families. We need more housing affordable to our professional families, teachers, public safety, health care, construction and other working families.

Our city needs housing affordable for young people, first time buyers, and others just entering the housing and job markets. This type of housing should be walkable, smaller, located near transit, and with simple construction to keep down the cost. A few key actions could make major progress on these goals and we encourage the city to consider them.

1. Adopt an Inclusionary Housing Ordinance.

An inclusionary housing ordinance is a 'low hanging fruit' for ensuring that a wider range of housing stock is developed in a community. Most cities have inclusionary ordinances, although sometimes they are not effective when the entity does not enforce it or allows lower cost in-lieu fees. Escondido could avoid these pitfalls by developing a quality inclusionary ordinance that requires housing to be built either on-site or at other acceptable locations. An ordinance that requires a percentage of affordable housing for lower income households in new projects would result in a greater number of affordable units being built in the city and would help reduce GHG emissions by providing places to live near jobs and transit, while helping meet fair housing goals. It should be a priority in the Action Plan.

2. Increased density in transit corridor areas, specifically the Palomar Hospital Redevelopment project

Escondido has a prime opportunity to increase density in a key urban area without contributing to gentrification. The development of the Palomar Hospital site is perfectly located for more density as it is located in the urban core and along a key transit corridor. This may be a case where additional city investment may result in many more housing units. This option should be seriously and fully evaluated.

3. Pursuit of Community Land Trusts, more ADUs, and investigate city support of housing projects

Community land trusts such as the San Diego Community Land Trust (SDCLT)² could be used to help get more moderate income for-sale housing built. The Action Plan should include evaluation of partnership or creation of a community land trust to see if this could be helpful in meeting the city's housing goals. Accelerating accessory dwelling units (ADU) and other types of density increasing strategies should be closely evaluated as a means to increase housing in the urban core and footprint. Last, the city should evaluate if and how it might make sense for the city itself to partner with other entities and be a housing provider.

4. Pursue Smart, Climate Protective Development

City should reprioritize land use and development pursuits to be in-line with efforts to protect the environment and improve quality of life. City should cease pursuit of annexations that draw funds away from city. For reasons unknown, Escondido in the past few years has avidly pursued annexations. While annexing some of the surrounded infill areas in the urban core may make sense, annexation of far-flung areas that need services, infrastructure, increases

² <http://www.sdclt.org/>

fire risks, climate impacts, and ultimately drawn financial resources away from significant needs in the city should be given up.

C. Support action on the North County Multiple Species Conservation Plan.

Regional habitat planning, done correctly, has major economic and environmental benefits. It directs development where it makes sense and protects, and links, the most critical habitat areas. The result can ensure survival of native plants and animals species. Under development for over 20 years, the North County plan has reached a critical point. If the North County MSCP is not developed soon, major habitat areas needed for the plan may be lost. While the city cannot undertake this effort alone, it can use its influence with the County and the other North County cities to urge that this regional plan move forward.

D. Prioritize enhancement of Escondido and Reidy Creek habitats to enrich the experience of the city and quality of the wetland habitats.

One much abused and under-utilized Escondido asset is Escondido Creek. The creek is currently a dangerous, unsightly, concrete channel in many places. Through the 'Reveal the Creek' project and other restoration plans, the creek could be turned into a wonderful amenity for the plants, animals, and people of the region. It would, of course, be a major undertaking, but the city should begin the effort in earnest with this Action Plan. There are many private sector and governmental partners, communities, and resources available to improve this environmental and community asset. Sierra Club urges the city to take the next important steps on move forward on the Reveal the Creek plan for the entire creek and take steps to connect the Willow Walk portion of the trail along the creek.

E. Develop new vision for Reidy Creek Golf Course, including restoration of Reidy Creek.

In October of last year, during the discussion in which JC Resorts' was, once again subsidized by the city for operation losses, a majority of the Council stated they wanted to evaluate options for a new plan for this area. In the next two years, the city should develop a plan for more public and recreational use of the golf course and work with partners to develop a restoration plan for Reidy Creek to enhance the habitat and increase recreational access along the creek as a community asset. This is another severely underutilized city asset that is prime for more public and recreational uses.

F. Promote sustainable agriculture and local growers

We appreciate the Mayor's commitment to our agriculture values and activities in the region. Sierra Club supports agricultural policies and practices designed to provide abundant healthy food, fiber and other services for all communities while maintaining the fertility of the soil and protecting the Earth's climate and the native diversity of plants and animals.³ There are many things that can be done in and by the city Escondido to address food security, reduce climate impacts, preserve habitat and open spaces, and support a healthy local farming community. Initiatives could include providing additional land for community gardens, encouraging local produce to be used in schools and other institutions, facilitate agricultural education in schools, assisting with protections from urban encroachment, water, and local

³ <https://www.sierraclub.org/policy/agriculture/food>

assistance programs to help new farmers become established. We look forward to learning more about the city's initiatives.

At a minimum, we request that the city provide any support necessary to facilitate local and grow the local Farmer's Market to ensure its success. At a recent meeting of a farmers interest group, we learned that community support is necessary for successful Farmer's Markets and lagging. They city can play an important role in helping this community and economic asset improve.

G. Clean and Expand Water Resources

- a. Complete relocation of the water Microfiltration Reverse Osmosis (MFRO) Plant to an industrial area. Again, we wish to thank the city for its community to relocate this plant. We support completion of this project as a priority in the action plan.
- b. Affirm the commitment to have inspectors active in doing stormwater inspections to improve water quality in storm water.
- c. Cooperate with community and environmental partners when they seek to assist in cleanup and restoration of sites, creeks/streams, and neighborhoods.

H. Work with County and State agencies to facilitate increased remediation timetable for the Chatham Barrel Yard remediation.

One of the worst hazardous waste sites in San Diego County is located in Southwest Escondido, the Chatham Barrel Yard was the site of a failed industrial waste 'recycling' plan which left a terrible, toxic legacy in our community. Even after over 20 years of monitoring and remedial actions, pollution from the site is still contaminating local groundwater and wells and Felicita Creek in Felicita Park. While the state is the lead agency on this site, the city should work with the state and the County to facilitate more action here.

I. Adopt/Update good government policies

During the campaign many important issues were raised about how Escondido operates as a government. To support public involvement, transparency, and fair elections, Sierra Club requests that the Action Plan includes an analysis and consideration of the following:

1. Revisit the public records retention policy of the city. The current short limits of record retention is very unsatisfactory and does not make for good or transparent government.
2. Significantly reduce campaign contributions for elections. The current limits are among the highest in the state and it is unnecessary and works against democracy for limits to be set at \$4,200 per donor.

Thank you for the opportunity to comment on this important planning document. Please let us know how we can assist the city on these important issues. We can be reached at conservation@sierraclubncg.org.

Suzi Sandore
Chair, Sierra Club North County Group

Laura Hunter
NCG Conservation Chair

cc. Mr. William Wolfe, Deputy City Manager