



North County Group
Sierra Club San Diego
P.O. Box 2141
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May 4, 2020

Mr. Adam Finestone
Principal Planner
City of Escondido
Via Email palomarheights@escondido.org

Re: Sierra Club NCG comments on Palomar Heights Draft Environmental Impact Report (DEIR)

Dear Mr. Finestone:

The Sierra Club North County Group (NCG) requests that the City Council reject the draft Environmental Impact Report for the Palomar Heights Redevelopment Project (DEIR); require updated and full analysis of higher-density alternatives; update the Development Agreement to include new climate measures, quality jobs, and affordable housing; and establish a working group to develop an urban infill/transit-oriented development strategy for Escondido’s urban core.

Sierra Club NCG filed an extensive comment letter on May 21, 2019 in a good-faith attempt to support a landmark, transit-oriented development worthy of this unique cornerstone location in Escondido. We are sorry to see this DEIR released for a project which fails to meet the need of the city or potential of the site. While we do not support this version of the project, we offer the following comments on the DEIR

First, the DEIR mis-characterizes the site right on the first page. This site is not at the ‘edge’ of anything. As the DEIR aerial shows, the site is in the center of Escondido’s urban core and among the most precious development sites in the city.



The DEIR is grossly deficient in many aspects and fails to meet any reasonable bar of a quality project or analysis.

1. DEIR fails to analyze reasonable alternatives.

The DEIR is deficient because it did not include all reasonable alternatives. The site is currently zoned for 1,350 units. In our NOP letter, we requested an alternative to be analyzed that reflected the **zoned density** of 1,350 units. Because the higher number of units is permissible under the current zoning, it is a reasonable alternative. The reason given in the DEIR why this was rejected as an alternative is that the economics would not support the construction of more than 510 housing units. Because the economic analysis to support this contention was not provided, the argument to reject the alternative is not supported, and cannot be considered a valid reason to reject the alternative. The failure to include it as a reasonable alternative is a deficiency in the DEIR.

The DEIR is deficient because it did not fully evaluate the impacts due to the reasonable alternatives of building 900 and 1,100 housing units. These reasonable alternatives were dismissed because they only evaluated the impact from the alternatives and did not include the many benefits—especially housing up to 600 more families. The DEIR failed to consider the benefits of increasing the number of people living in a location that is easily served by transit and in a walkable, bikeable area. Additionally, being in the urban core the project site is close to stores, restaurants, and other amenities which would reduce the distance needed to drive. If the impacts and benefits were assessed, as they should be, on the emissions per capita, the higher density project would end up with the lower impacts. The failure to fully evaluate the impacts and benefits from the 900 and 1,100 housing unit alternative is deficiency in the DEIR

The dismissal based on the presence of granite needing blasting is also suspect given that there is currently a high-rise building on the location. The ability to replace that high-rise without addition blasting should have been part of the analysis, not just a general dismissal without evidence.

More problematic, the only alternatives fully analyzed were for even **fewer** units adding to the failing of this DEIR. Thus, neither the project itself nor any of the alternatives sufficiently implement the Downtown Specific Plan. Again, a major deficiency.

The failure to analyze these reasonable alternatives renders the DEIR wholly inadequate under the law. NCG requests the city prepare a supplemental DEIR to fully analyze these higher-density alternatives.

2. Lack of affordable housing a significant deficiency.

As we pointed out at length in our May 21, 2019 letter, Escondido has a huge deficit of affordable housing. We have included that letter for the record. The project should be required to include a minimum of 15% affordable units.

3. DEIR fails to incorporate climate saving measures or new realities in planning.

This project should be required to include climate saving measures as conditions of approval such as complete building electrification, solar power, electric shuttle to and from the transit station, and high levels of energy efficiency as conditions.

Further, the proposed project worsens climate and air pollution impacts as it employs 1980's suburban planning requiring the site to be graded necessitating retaining walls & slope banks. The result is physical isolation of future residents from the surrounding neighborhood and will not encourage pedestrian activity to and from Downtown or eastward. More likely, it will encourage vehicle usage.

4. DEIR and project description fail to disclose testing and fail to adequately discuss the presence of asbestos containing building materials, lead based paint and their remediation.

As a building of a certain age, the hospital most certainly contained asbestos. We are confounded why there is no discussion of asbestos and lead-paint issues in the hazardous materials section addressing demolition, but it is noted to be present in the text dismissing the Building Reuse option. If it has all been removed, the DEIR should indicate that. If it has not, the plan for asbestos removal should be discussed.

5. New climate measures, quality jobs and affordable housing requirements should be added to the Development Agreement.

This project also has a responsibility to meet the needs of the city. The needs are good-paying jobs for local people and affordable housing. The Development Agreement should include conditions in these areas. The current reliance on the outdated ECAP is a failing given that the construction alone will last until 2026. The Development Agreement should specify that this project comport to any and all requirements in the updated ECAP expected later this year.

Escondido deserves better than this project. The future demands better.

This site is the opportunity of a lifetime and it is the heart of Escondido's downtown. The proposed project is underwhelming on every level. It is not the landmark, project the city needs, just the project the developer wants. It does not house as many people as were planned and fails to meet its potential as a perfect transit-oriented location.

This project is an anachronism. The climate crisis is here. Every possible signal has been given that we must grow and develop our region quite differently than has been done in the past. Urban infill, increased density in transportation corridors, and more affordable housing options are critical for residents of the region. Because this site is located near downtown, is infill, will not exacerbate gentrification, and is on a transit corridor, density should be maximized.

Further, greater density would also serve the city council's own interest in helping revitalize Escondido's downtown by providing much more foot traffic for local shops and

restaurants. This is our biggest opportunity to achieve economic revitalization in this prime location and should not be wasted on relatively low-density housing.

Sierra Club NCG is a strong supporter of development of the Palomar Hospital site. However, we opposed to this project because the density is too low for this prime location and we will continue to oppose the current project. It does not include enough housing, does not serve residents of Escondido with housing they can afford, does not require any designated affordable housing, does not create good-paying jobs for local workers, does not meet the climate challenge, does not reflect current and future planning measures, and does not create a landmark for the city.

Process Request

While this project continue to process, we urge the Council to create a stakeholder working group to develop an urban infill/transit oriented development strategy that also addresses the housing needs of lower and moderate income households for downtown and other corridor areas already in the urban footprint prior to making further development decisions. This strategy should then be incorporated into the city's Climate Action Plan Update, to make Escondido the region's leader in implementing the kind of smart growth tools needed at the local level to meaningfully address the climate crisis. We believe the city would have many coalition partners ready to support and help develop the projects needed to activate and enrich Escondido. We would welcome the opportunity to work with you on such an effort.

In closing, to make this project one appropriate for Escondido in this time and place, the Sierra Club NCG recommends the following actions be taken:

- 1. For the reasons stated above, the City of Escondido should reject the DEIR and send it back for full analysis of higher-density, reasonable alternatives, better integration of climate protective measures then, re-issue a supplemental analysis.**
- 2. The City of Escondido should update the Development Agreement to include climate measures, quality jobs and affordable housing requirements and compliance with updated CAP.**
- 3. Create a working group tasked with creating an urban infill/transit-oriented development strategy for Escondido.**

Thank you for the consideration of these comments.



Laura Hunter, Chair
NCG Conservation Committee

cc.
Mayor and City Council