



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

March 22, 2020

Mayor and City Council  
Escondido City Council  
201 N. Broadway  
Escondido, CA 92025

**Via Email**

**RE: Sierra Club requests for additional consideration in Housing Element Update Study**

Dear Mayor and Councilmembers:

In all of our actions, Sierra Club seeks to support conditions for a sustainable future for our communities, region, country, and world. Sierra Club's mission in combination with growing threats to our environment require a renewed emphasis on cities and towns where people can live, work, and thrive while protecting and restoring our natural environment and reducing the causes and impacts of climate change. Our resilience to the threat of climate change begins with our social, cultural and economic resilience, which depends upon inclusive and fair communities.

We support a future where all enjoy clear air and water, nature is protected, the climate is stabilized, and all people are housed. NCG believes that now it the time to address the intersection of the most significant challenges of our time- climate change, income inequality, and housing affordability. Due to different priorities in the past, Escondido has significantly underproduced moderate and lower cost housing. It is this housing type which needs to be the focus of our collective efforts.

As half of Escondido residents are renters, we also need to increase opportunities for home ownership at moderate and lower levels as an important means of building wealth for lower-income people. These are critical needs and should be a focus of the Escondido Housing Element update and study.

Further, higher-density housing near transportation corridors is an imperative because transportation costs are the second highest expenditure and financial burden to lower income households. In addition to the considerable environmental benefits, putting housing closer to jobs and transit also lowers the transportation burden for residents. Transportation costs are 22% of the household budget in Escondido with the average household spending well over \$1000 a month on transportation.<sup>1</sup> In California, sprawl patterns have created a higher

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<sup>1</sup> <https://htaindex.cnt.org/fact-sheets/#> <https://htaindex.cnt.org/fact-sheets/?focus=place&gid=2240>

transportation burden due to longer commutes such that, for anything over a twelve mile commute, the transportation costs outweigh any savings in housing.<sup>2</sup>

National Sierra Club has a strong urban infill<sup>3</sup> policy. Development should be dense, inclusive, and located within or connected to existing communities and neighborhoods. New development should be designed to make neighborhoods walkable, and neighborhoods in the city and metropolitan contexts should be linked together by convenient high-quality transit prioritized in regional, state, and national transportation expenditure plans. There are many areas in Escondido which could meet these criteria.

We regret that we could not attend the Council meeting when the Housing Element study Request for Proposal was adopted, but as part of the study, we request that the following actions be evaluated as additional means to meet the housing needs of residents in a manner that offers the housing we need, supports an effective transit system, reduces VMT and climate impacts, and serves to invest in and improve our current city footprint.

### **1. Adopt an Inclusionary Housing Ordinance.**

An important action would be to adopt an inclusionary housing ordinance to require a percentage of affordable housing for lower income households in new projects. This could result in a greater number of affordable units being built in the city, could help reduce GHG emissions by providing increasing density more easily served by transit, and help the city better meet its fair housing goals. Last year, the city of San Diego significantly updated and adopted a new inclusionary policy. This would be a recommended starting point since it was a compromise supported by many stakeholders.

With more affordable commitments near transit, more funding may come available for multi-family and transit-oriented development such as the Affordable Housing and Sustainable Communities grant program.

### **2. Maximize density in transit corridor areas and reduce parking requirements**

Where infill development is occurring in areas that will not exacerbate gentrification, density should be maximized. Parking requirements should be reduced to allow more affordable prices and more transit use and **reduce parking requirements for projects near the transit center by at least 50%.**

### **3. Maximize Accessory Dwelling Unit (ADU) development**

The city should continue to ease regulations on and lower or eliminate fees for accessory dwelling units. The city could even float low-interest loans for owners considering this (if it is legal to do so). Encinitas has a great policy on ADUs.

The city should also investigate use of these loans in creative ways. For example, the interest rate could be 0% or some portion of the loan could be waived if the property owner agreed to set the ADU aside for households earning 50% or 80% of Escondido AMI. Although this would require the city to become involved in screening or assuring tenants qualify, this could be investigated to see if or how it could work.

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<sup>2</sup> <http://www.reconnectingamerica.org/assets/Uploads/pubheavyload1006.pdf>

<sup>3</sup> <https://www.sierraclub.org/sites/www.sierraclub.org/files/sce-authors/u19041/SClub%20Infill%20Policy%202019-05-18.pdf>

#### **4. Investigate Community Land Trusts**

Community land trusts such as the San Diego Community Land Trust (SDCLT)<sup>4</sup> could be used to help get more moderate income for-sale housing built. We understand that there are two active projects now, one in Nestor and one in Lemon Grove. This is worth investigating.

#### **5. City could evaluate getting into the business of housing.**

At the 2018 Environmental Summit meeting an interesting dialog occurred. It was noted that the County and others were already in the 'business' of housing people. Homeless shelters, prisons, and other such 'housing' activities are something local governments are involved in. The city could choose to be a housing developer or partner in major and minor projects. We would urge the city to look into its ability to enter a public/private partnership in projects like the Palomar Heights development as a means of achieving projects that best serves the city. The city could also, like Chula Vista, partner with school districts.<sup>5</sup> There are several ways this could manifest short of the city becoming the developer itself such as partnering on certain city-owned parcels if the city can direct the type of housing built.

#### **6. Promote and facilitate models from other communities.**

##### **a. Tiny Home transitional neighborhoods and housing**

Tiny home neighborhoods such as Emerald Village in Eugene, Oregon<sup>6</sup> are an emerging response to transition housing that can meet many needs at once in a small location. The city may want to create its own definition of a Tiny Home so we have some consistency.

##### **b. Promote and facilitate Co-housing projects.**

This concept, begun in the Netherlands, is sprouting new projects all the time<sup>7</sup>. An established community can be viewed in Bellingham, WA.<sup>8</sup>

##### **c. Build-to-Own projects**

A unique approach can be seen in again in Eugene that promoted low-impact density increases and ownership. This may be something that could be evaluated and encouraged in Escondido to provide more homes and teach residents marketable skills and build ownership opportunities.<sup>9</sup>

#### **7. Allowance of single-family replacement with duplex or triplex**

While the state allows most places to make a single-family home effectively into a duplex, the city could take the next steps allow replacement of a single-family dwelling with a triplex to and allow more gradual density increases within existing development footprints. This facilitates multigenerational living and access to more housing within areas that already have infrastructure in place.

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<sup>4</sup> <http://www.sdclt.org/>

<sup>5</sup> [https://www.sandiegouniontribune.com/news/education/story/2020-02-16/chula-vista-school-district-wants-to-build-affordable-housing-for-teachers?utm\\_source=SDUT+Essential+San+Diego&utm\\_campaign=bbc1926df4-EMAIL\\_CAMPAIGN\\_2020\\_02\\_17\\_08\\_04&utm\\_medium=email&utm\\_term=0\\_1cebf1c149-bbc1926df4-84855477](https://www.sandiegouniontribune.com/news/education/story/2020-02-16/chula-vista-school-district-wants-to-build-affordable-housing-for-teachers?utm_source=SDUT+Essential+San+Diego&utm_campaign=bbc1926df4-EMAIL_CAMPAIGN_2020_02_17_08_04&utm_medium=email&utm_term=0_1cebf1c149-bbc1926df4-84855477)

<sup>6</sup> <https://www.squareonevillages.org/emerald>

<sup>7</sup> <https://oakleighmeadow.org/about-cohousing/>

<sup>8</sup> <https://bellcoho.com/our-community/>

<sup>9</sup> <https://www.eugeneweekly.com/2019/11/27/build-a-home/>

**8. Increase and support pilot projects within the city.**

Escondido is well-positioned to encourage pilot projects within its boundaries. There are many new and innovative ways people are being housed the city should examine.

- a. **Student housing in senior care centers.** Consider, free room and board to students to live at a senior care facility that has vacancies in exchange for spending time and eating meals with residents there.
- b. **Renting Partnerships.** Conversion of rents into dividends that can help families earn equity while renting or other innovative ways of helping renters earn equity. We encourage the city to work with innovative local developers on strategies that can address this issue.
- c. **Promote a Rent-to-a-Student program.** Many seniors or ‘empty-nesters’ in Escondido might be encouraged, incentivized to offer a room in their homes for rent to students. There would be an effort on the part of the city to help increase awareness of the need and opportunity here.

**9. Identify and rehabilitate poorly kept and underutilized housing stock.**

Create a program to replace, where necessary, with increased density and more energy efficient buildings—a part of the CAP.

**10. Create a stakeholder forum to provide much needed education and input on housing development in the city.**

The city, and the region, are at a crossroads in terms of housing. Higher-density, transit-oriented development is essential if we are to meet our community, environmental, and humanitarian goals. A facilitated stakeholder group could provide the opportunity we need to discuss a variety of topics, including discussions about a range of specific measures, such as the need to reduce conversion of habitat and agriculture to development and consideration of ministerial permitting options for specific housing we need. It is imperative to have this kind of constructive conversation during times where there are not specific projects at issue. We need to change the paradigm about housing density and public education through a stakeholder process may be a critical key.

Thank you for the opportunity to comment on this very important issue.

Sincerely,



Suzi Sandore, Chair  
NCG Executive Committee



Laura Hunter, Chair  
NCG Conservation Committee