



North County Group  
Sierra Club San Diego  
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September 21, 2020

Mr. Mike Strong, Director  
Community Development  
City of Escondido  
**Via Email** [mstrong@escondido.org](mailto:mstrong@escondido.org)

**RE: Sierra Club NCG comments on Escondido East Valley –Draft Existing Conditions**

Dear Mr. Strong:

Sierra Club North County Group (NCG) has reviewed the Escondido East Valley draft Existing Conditions Report (Report). We are excited to see the city pursuing a plan in a prime area for urban infill and mindful redevelopment that can bring significant benefits to current and future residents in the city. We are also excited to see this plan moving forward since this entire area is a Priority Investment Neighborhood as recommended by the Escondido Environmental Community Advisory Committee’s (ECAG). Many of the actions contemplated in the report, if taken, would address inequities in that area and should be a focus of the city. Our general comments below focus on opportunities related to housing, green infrastructure, sustainable energy, transit, and urban forestry.

The impacts that can be expected from climate change must be a priority fundamental ‘existing condition’ that must underly this entire planning effort. Those impacts were presented to the [Planning Commission on August 25, 2020](#) by Dr. Dan Cayan from Scripps Institute. These expected conditions include:

- Increased intensity of storm events resulting in increased flooding
- Increased intensity and duration of high heat events
- Increased severity and duration of droughts

To be appropriate for future conditions, the East Valley plan must systematically and completely address expected adverse impacts from climate change.

**A. Green Infrastructure: *The East Valley District is a great opportunity to re-design with green infrastructure in mind.***

As noted in the report, Escondido Creek - located along the northern boundary - provides a fantastic opportunity to provide the ‘backbone’ of green infrastructure for this underserved and underinvested area. But we urge the city to go even further than the report recommends, and evaluate where the creek could be expanded, naturalized, and improved as a beautiful, refreshing, community, and environmental asset. Equally important, this effort has the co-

benefit to create a more natural and effective stormwater conveyance system to help mitigate future flood events.

Tree-lined walkways connecting the 'creek district' into the neighborhoods would not only beautify the East Valley District, but it would create a more sustainable and healthier place to live, work, and play by reducing heat island effects and pollution burden. In addition, it would provide a valuable "carbon sink" to help sequester some GHG emissions. See section F below for additional comments.

The ECAG has also recommended a Riparian Restoration Initiative which could be showcased in the East Valley area.

***B. Housing: The East Valley District presents an incredible opportunity to develop housing we need in the right location.***

We agree with many of the *Opportunities and Recommendations* in the Report related to increasing residential development, density, and livability of the area. We also support changes, particularly in the *office* zone area that will accommodate more transit-friendly development. In addition, we would like to offer specific comments for the East Valley Plan as it relates to housing options. We are all aware of the lack of affordable and workforce housing in the region. We are also aware of the climate crisis and its close integration with the need to address transportation emissions by improving public transit and more urban infill.

With these important considerations in mind, Sierra Club NCG strongly urges the city to take the following housing specific actions as they relate to the East Valley Plan.

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

A high impact and therefore high priority action to take is the adoption of an inclusionary housing ordinance that requires an appropriate percentage of affordable housing for lower income households. Such an action should be done immediately so that existing and future development projects can anticipate and integrate these policy requirements accordingly. The end result would be a greater number of affordable units being built in the city and a significant reduction of GHG emissions by providing increased density more easily served by transit. Ultimately, it would help the city 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 increased affordable unit commitments near existing and planned transit, more funding may become available for multi-family and transit-oriented development, such as the Affordable Housing and Sustainable Communities grant program.

**2. Adopt a Tiny Home Ordinance to facilitate gradual density increases.**

This year, the city of San Diego joined the cities of Sacramento, Denver, Los Angeles, Fresno, and San Jose by unanimously adopting a [Tiny Home ordinance](#). These tiny housing products are inexpensive and can become a source of income for homeowners.

They are considered ideal for students, seniors, caregivers, and multi-generational family living. These examples are a model for another immediate and impactful action the city of Escondido should pursue to establish the rules and intent for future infill projects

### **3. Re-zone the medical district east of the Palomar Hospital site for higher residential density.**

A significant opportunity to revitalize the urban core of Escondido could be realized by re-zoning the current medical zoned properties to allow for higher density residential development where appropriate. With careful mixed-use zoning, housing density could be increased without causing displacement of existing residents, or significantly changing the character of an existing residential area. Gentrification is a major concern and often plagues other efforts to increase density, but here, like the old Palomar Hospital site itself, significantly more housing of ALL types can be achieved without the attending gentrification. Further, the location between two major transportation corridors makes it perfect for higher density development.

### **4. Establish minimum density in areas where we need and can support higher density infill.**

A major problem that has faced efforts to develop adequate housing that is affordable to families at all income levels is the practice of building at much lower densities than planned. The situation at the old Palomar Hospital and the area near the transit center are good examples of the need for a 'minimum density' requirement. This would be key to providing affordable and desirable housing for all income levels, while assisting the city to meet its fair housing as well as its Climate Action Plan goals.

### **5. Facilitate maximize density in transit corridor areas**

Where infill development can occur in areas that will not exacerbate gentrification, density should be maximized. Parking requirements for projects linked to transit centers should be evaluated for reduction to allow more affordable prices and encourage more public transit use. Effective 'last mile' transit can also reduce the amount of parking needed at transit centers.

Because transportation costs are the second highest expenditure and financial burden to lower income households, it is imperative to create higher-density housing near transportation corridors. 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 high transportation burden due to longer commutes such that, for anything over a 12-mile commute, the transportation costs outweigh any savings in housing.<sup>2</sup> In addition to the considerable

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

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

environmental benefits, putting housing closer to jobs and transit can significantly lower the transportation burden for residents.

East Valley is a perfect place to achieve many of the goals in our National Sierra Club urban infill<sup>3</sup> policy. East Valley could serve as the ideal location and model plan for denser and inclusive development 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.

## **7. Plan with intent to avoid displacement.**

The East Valley planning process provides a great opportunity to add housing to the urban core. However, it must be done in a manner that will avoid the displacement that often is a result of gentrification. We recommend the city investigate and quickly adopt anti-displacement actions such as those recommended by the National Low Income Housing Coalition. NLIHC recognizes the difference between neighborhood revitalization and displacement. They state, “*Development without displacement is the key. Fighting against displacement rather than fighting against development should be the focus.*”<sup>4</sup> Among the policy solutions to address displacement, they list, Community Land Trusts, Community Benefits Agreements, Tenant Option-to-Purchase, Vacancy Taxes, regulation of short-term rentals, etc..<sup>5</sup>

Another good resource is Samuel Stein’s [Capital City: Gentrification and the Real Estate State](#). This source offers suggestions for not-so-conventional solutions to this issue including promoting policies that facilitate the transfer of land and property in mortgage default to city for housing rather than to speculators for profit and enabling cooperatives, non-profits, and land trusts that take housing and the land it sits on out of the market.

## **8. Identify and rehabilitate poorly kept, underutilized, and vacant housing stock.**

We were surprised to learn that there are almost 2,000 Escondido housing units existing, but vacant. We request that the city do an investigation into why these units are not in use and see what actions can be taken.

### ***C. Transit: The East Valley District is the perfect area to pilot aggressive transit options and build the walking/biking infrastructure.***

Increases in workforce housing and reduction in Vehicle Miles Traveled (VMT) are necessary elements to address the climate crisis. The East Valley District is a central area that could provide both housing and commercial density coupled with visionary transit and

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

<sup>4</sup> <https://nlihc.org/resource/gentrification-and-neighborhood-revitalization-whats-difference>

<sup>5</sup> <https://nlihc.org/resource/gentrification-and-neighborhood-revitalization-whats-difference>

transportation options. This area could act as a mobility hub with a regular electric shuttle, walking paths and biking routes in dedicated lanes. Connections north, south and west to the transit station can facilitate meaningful VMT reduction. We view this as ideal strategic partnership with SANDAG.

***D. Energy Sustainability: Plan should seek carbon neutral conditions, building and transit electrification, and investigate deployment efficient energy micro-grids.***

The specific plan is a perfect opportunity to begin the carbon neutral vision for the city. A growing body of work indicates that aggressive building electrification will be required to achieve carbon neutrality. Because natural gas remains a very significant source of emissions, to fully transition away from fossil fuels, we have to eliminate natural gas consumption through building electrification, especially because continuing to build natural gas infrastructure is locking in decades of emissions. [This Cal Matters opinion outlines 5 key actions the state should take](#), has some good high-level points on the subject, and [this Rocky Mountain Institute also](#) describes this building electrification scenarios more in depth. The specific plan drafters should seriously examine these recommendations for inclusion in the plan.

Further, the compact size of the East Valley District and the mixed use of housing and commercial make it an ideal location for a micro-grid based on renewable energy. One definition of a micro-grid is a self-sufficient energy system that serves a discrete geographic footprint, such as a college campus, hospital complex, business center, or neighborhood. Within microgrids are one or more kinds of distributed energy (solar panels, wind turbines, combined heat & power, generators) that produce its power. In addition, many newer microgrids contain energy storage, typically from batteries. Some also now have electric vehicle charging stations. Microgrids can be highly efficient as they avoid line losses of energy delivered over long distances, while also safeguarding against outages resulting from losses elsewhere on the electric grid.

According to the Department of Energy, microgrids are an important part of the strategy for an energy efficient future. Its website [outlines many benefits](#). A well-known local example, is the [Borrego Springs Microgrid](#) which should be evaluated for applicability for areas of Escondido.

As an additional challenge, we should consider making the East Valley District a Carbon Neutral zone, which can lay the groundwork to employ all the various climate and energy techniques required to move the city as a whole toward a carbon neutral future.

***E. Water: Stormwater measure must reflect new flood state conditions which are expected.***

With a major restoration focus on Escondido Creek, stormwater control measures can be sized to reflect what we know are future flooding conditions, while also bringing the added benefits of heat island mitigation and creating a beautiful, natural carbon sink. We strongly agree with the recommendations on page 58, but also encourage the city to investigate if and

where the creek can be widened to create a natural stormwater conveyance as well. We strongly recommend the city enlist partnership and guidance from the Regional Water Quality Control Board and San Diego Coastkeeper as it plans for this region.

**F. Urban Forestry: *Increase Tree Canopy***

“Livable” neighborhoods are often described as those with parks, trees, and shade. Impacts to residents during extreme heat events is a health crisis which is expected to worsen in the future. Neighborhoods will have more heat-related illness where they have more concentrated pavement, few trees, less health care access, more asthma, and lack of working air conditioning units. All residents of Escondido deserve to live in a healthy neighborhood. Increasing tree canopy is an affordable and effective way to cool neighborhoods, beautify the city, and sequester carbon to help mitigate climate change. As such, it is imperative that the City invest in a tree planting and maintenance program as outlined in the ECAG’s recommendations on the draft for the updated 2020 Escondido Climate Action Plan.

**H. Infill Focus: *Quality infill is the key to success of the city and the region.***

With the climate crisis upon us, we truly need all-hands-on-deck to address it. Infill development, a denser city core, and efficient and effective transportation must be the way of the future. We strongly urge the city to be laser focused on its efforts for quality and visionary infill.

To continue to expend resources, time, attention, and public and staff energy on projects like Harvest Hills is a theft from the future. Given that both the land and ocean outfalls are approaching their capacity limits<sup>6</sup> and Escondido is facing huge capacity deficiencies in just nine years<sup>7</sup>, no public resources of any kind should be wasted on projects like Harvest Hills that do not comport to the model of the future we must follow. For example, the city should not squander any excess capacity it might have in our wastewater treatment facility on single-family sprawl development projects. Sewer capacity should be preserved for the projects we need now.

Thank you for the opportunity to comment on this important planning effort. Please contact us at [conservation@sierraclubncg.org](mailto:conservation@sierraclubncg.org) with any questions or for more information.

Sincerely,



Laura Hunter, Chair  
NCG Conservation Committee  
cc.  
Mayor and City Council  
Escondido Planning Commission

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<sup>6</sup> Draft page 46

<sup>7</sup> Draft page 48