



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

March 24, 2021

Mayor McNamara and City Council
City of Escondido
Via Email

RE: Sierra Club NCG initial Comments on Draft 2021 Escondido Housing Element

Dear Mayor and City Council Members:

Sierra Club North County Group (NCG) has previously submitted extensive comments in the planning stages on both the proposed [Housing Element](#) and the [East Valley Specific Plan Update](#).

NCG plans to engage in the public review process but **we request that the city not begin the environmental analysis or submit the draft plan to the state** until you have had some (longer than a few days) review period on the Housing Element and the East Valley Specific Plan, and there has been at least one public workshop in which the Council can consider amending actions to the draft. Our experience with the Climate Action Plan is that once the draft went in for the environmental analysis it was far more difficult to make significant changes to the goals, approach, or other aspects that may be needed.

Overall comment

NCG supports the housing and development strategy outlined in the [Quality of Life Coalition letter dated November 18, 2019](#) which read, in part,

As more development projects come before you, to focus and maximize resources now and to realize a successful transit-oriented future, projects adopted by the city should meet clear objectives. Projects that the city supports should reduce (not increase) VMT; avoid high-risk fire areas; ensure safe evacuation routes for all residents; add to affordable housing stock; qualify as infill developments; contribute to the support of transit; preserve and protect core habitat and open space areas; are on or near transportation corridors; require the job quality and workforce standards...; address climate impacts in the near and long-term; and, implement land use patterns consistent with tenets of good planning. Projects that do not meet these objectives, should not be pursued.

The Housing Element Update should reflect and incorporate all of these factors and detail how they will be achieved to maximize production of needed housing, support job quality, ensure effective climate action, and implement good planning.

Specific Comments

1. First, we disagree with the statement in the staff report which states, “*The City has historically met, and plans to continue meeting, the need for low- and very low-income housing through designation of appropriately zoned land.*” This is incorrect. The City has **not met** its requirements for very-low and low income housing at all. That is why we have a significant housing problem in Escondido.

The most recent example of Palomar Heights decision highlights the issue. The site was zoned for dense development but permitted for much less. Over and over in urban Escondido, the planned designation of units does not turn into the promised density.

To address this problem, we recommend the city:

- a. Require a minimum density for development where needed and
- b. Adopt an inclusionary housing ordinance or other requirement which will result in construction of actual affordable housing like many other cities require;
- c. Commit to using some of its American Rescue Plan funding to create a city sponsored Affordable Housing Fund or Land Trust in order to ensure development of actual housing we need; and,
- d. Develop a multi-action Affordable Housing Program comprising of multiple commitments to address this issue.

2. We request revision to the strategy where the city seems to be pursuing where affordable units and market rate units are, primarily, planned to be segregated. A quick look at Table A-3 Projects under review reinforces that economic segregation. An ordinance of some kind must be adopted to require that, as project go in, affordable units must be included in the project itself to build a more inclusive community.

C. Projects Under Review

Project	Description	Market Rate Units	Affordable Units
SUB 09-0005 – 1221 N. Gamble St.	3 SFR lots on 0.64 ac.	3	0
SUB 15-0019 – Safari Highlands	Specific Plan for 550 SFR lots on 1,100 ac.	550	0
Touchstone – Ivy	4 story, 95 new units. Purchased by affordable housing developer (MAAC).	0	95
SUB 15-0025, 701 San Pasqual Valley Road	18-lot TM and PD on 7 acres	18	0
ADM 19-0092, 1860 S. Escondido Vermont Apts.	44 apartments	40	4
ADM 20-0085, 322 S. Escondido	172 units	0	172
ADM 20-0011, 118 S. Orange	3 units	3	0
PHG 20-0036, 829 S. Escondido Blvd.	70 residential units	35	35
ADM 20-0070, 337 E. Valley Pkwy	50 unit affordable housing	0	50
ADM 20-0136 664 N. Fig Street	15 affordable apartment units	0	15

Source: Escondido Major Development Project Processing List, August, 2020.

3. The 90 units from the Palomar Heights project listed under affordable housing in Table A-2 are incorrectly noted there. These units are not deed-restricted and, merely by the fact they are designated for ‘seniors’, does not mean they will be affordable. While many seniors live on very limited means, many others do not. Either the city should deed-restrict these units or take them off the guaranteed affordable housing list.

4. There is a significant disconnect in policies the city plans to pursue and the RHNA status Table 56. Although the city has significant ‘Identified’ sites for Very Low income, there are **zero** approved, undergoing entitlement, or under construction. Further, we know that ‘planned’ units may fail to materialize such as occurred with the Palomar Heights decision where 1350 units were reduce to 510 –**significantly under density and including no affordable housing**. All of this demonstrates the dire need for some kind of **guaranteed** affordable housing requirement that travels with project approvals for Above Moderate units. If there had even been a very modest 10% requirement for affordable units in a project built to the density it was planned, the current total would have yielded 135 additional affordable units.

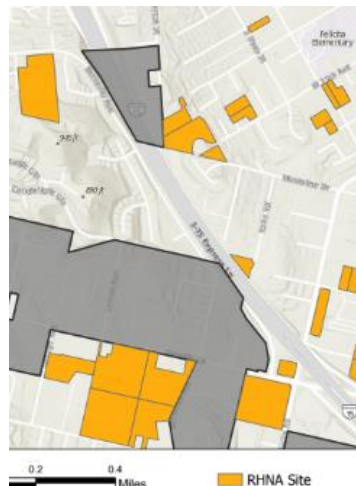
Table 56: Summary of RHNA Status

Site Category	Above Moderate	Moderate	Low	Very Low	Total
RHNA	4,967	1,527	1,249	1,864	9,607
Units on Identified Sites	1,005	388	0	7,268	8,661
Approved and Under Construction Projects	1,357	0	245	0	1,602
Projects Undergoing Entitlement	649	0	371	0	1,020
Accessory Dwelling Units	153	262	99	126	640
Total Identified Capacity	3,164	650	715	7,394	11,923

What the city is currently doing to provide adequate affordable housing is not working. This Housing Element update is the perfect opportunity to change that.

5. In assessing the environmental health impacts on Table 58 the State CalEnviroScreen should also be incorporated as a data source.

6. RNHA sites should be selected to respect ARB guidance on air quality buffers from freeways. In both the North and South City land use designations for RHNA site show a significant number of areas that are within the 500-foot buffer that the Air Resources Board states in it Land Use Guidance document is unhealthful. Locations within 500 feet of a major freeway or heavily trafficked road should be used for commercial or other uses and not to house vulnerable residents in an area known to have a major negative impact on their health.



7. Expressed commitment to avoiding conversion of ridgetops and building on steep slopes [and in high hazard areas](#) are yet more reason that Harvest Hills should be abandoned by the city. Wasting time, energy, money, and goodwill on the pursuit of a land speculators fantasy is not appropriate.

We expect to have additional comments during the public comment period. Please contact us at conservation@sierraclubncg.org with any questions or for more information.

Sincerely,

A handwritten signature in blue ink that reads "Laura Hunter". The signature is written in a cursive, flowing style.

Laura Hunter, Chair
NCG Conservation Committee
cc. Planning Commission