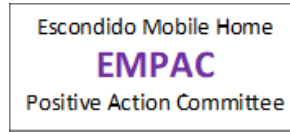




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Escondido Community Housing Coalition

July 26, 2021

Mayor and City Council
 Planning Commissioners
 City of Escondido

Via Email – Corrected version sent July 30, 2021

RE: Escondido Community Housing Coalition Recommendations for Amendments to Escondido Revised Draft Housing Element

Dear Mayor and City Council and Planning Commissioners:

The Escondido Community Housing Coalition (EHC) is composed of social and environmental justice organizations within San Diego County that have united in advocating for the creation of inclusive, thriving communities, where every resident in the City of Escondido has access to affordable, safe, housing near job and transit centers.

We urge the Planning Commission and City Council to make the following revisions to the Draft Revised Escondido Housing Element (HE):

1. Create an Escondido Housing Commission.

Escondido has not had a Housing Commission for over 10 years. However, it is clear that such a commission is now timely and could be helpful to further housing goals in our city. We recommend that the EHE re-establish an Escondido Housing Commission. There seem to be many programs dispersed throughout the city that can be unified under a centralized Housing Commission. The Housing Commission in Oceanside is a successful model of community involvement and oversight of a city's housing programs and initiatives. The mandatory public involvement requirement for the housing element could be achieved through a commitment to a Housing Commission. Housing is an important issue, especially now as the California Eviction Moratorium ends on September 30, 2021. Escondido needs to establish an advisory Housing Commission.

2. Require development of an Inclusionary Housing Ordinance for Escondido.

Ten of the 18 cities in San Diego County already have inclusionary housing ordinances (IHO). The County has directed its staff to create an IHO for the unincorporated area. The incentives-only strategy has thus far failed to serve the residents of Escondido with the affordable housing that is needed. We request that the Council direct staff to investigate and propose an IHO for Escondido with an ultimate goal of 25%, on-site, deed restricted, affordable housing requirement for nearly all new housing projects. If in-lieu fees are to be attached to a future IHO, we request that they be significant enough to result in actual affordable housing project construction. We recommend that Escondido require developers to pay an in-lieu fee of \$25/sf such as is required by the City of San Diego. Last, other cities also include an in-lieu fee for projects between 2-10 units. This would be another aspect to include in the analysis.

3. Create a two-tiered approach to inclusionary housing.

As part of an IHO, we recommend the city establish a two-tiered inclusionary program. The first tier based on the existing zoning framework and the second associated with city actions that increase land values, such as plan updates, density bonuses, specific plans, and up-zonings. Those public actions can significantly increase land values and it is only fair and inclusive policy to recapture some of those increases for public benefit through higher inclusionary requirements.

4. Remove proposed housing locations within 500 feet of a freeway or routes heavily trafficked by diesel trucks.

Housing development within 500 feet of a major freeway or heavily trafficked road is extremely hazardous for human health and should not be used to house vulnerable residents. The California Air Resources Board (CARB) did a Land Use Guidance document in 2005 and its guidance is clear, avoid siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day. Any targeted location for affordable housing development under the RHNA delegation should be removed and relocated to a more healthful location.

5. Remove proposed housing from locations in Very High Fire Severity Zones and concentrate in area served by transit and other existing infrastructure.

Sprawl development in high-VMT and high fire hazard areas is one of our region's greatest sources of air emissions. Development in these areas threatens the health of all residents, especially those unable to protect themselves during fires. Directing infrastructure and maintenance resources away from the city core to support sprawl is an injustice and does represent equitable development. Further, it does not comport with the city's General Plan commitment to sustainable development. The EHE should prohibit development of housing in hazardous fire areas far from existing infrastructure and should focus resources, time, and attention on funding and improving Escondido's urban core

6. Urban Greening should be an integral part of improving housing in Escondido.

The recent heat waves are a direct threat to the health and well-being of residents in Escondido. Adequate tree canopies are known to lower heat in impacted areas as much as 10 degrees. The Priority Investment Neighborhoods designated in the Climate Action Plan should receive early planning and funding for increased tree canopy, parks, and green spaces where they are supported by the residents. Further, studies have shown that access to green spaces is

important for children and healthy families. We recommend that the EHE specifically commit to early focus on tree canopy and other green infrastructure improvement as described in the Escondido Climate Action Plan noted below.

“Develop an urban heat island reduction program that includes an urban forest program or plan for priority investment neighborhoods (“PINs”) that achieves a tree planting coverage of at least 35 percent. Expand and focus tree plantings in low canopy neighborhoods and neighborhoods at a higher risk of adverse outcomes of urban heat island effects and to encourage urban agriculture through edible landscapes within some publicly accessible areas.” (ECAP at 3-23)

7. EHE should include actions to specifically ensure Rent Forgiveness programs are accessed by residents and a Tenant Protection Ordinance and Rent Registry System should be adopted.

We recommend the EHE commit the city to create a Tenant Protection Board which would be responsible for providing legal, mediation, and arbitration services to tenants in Escondido to protect them from illegal evictions and homelessness. In addition, a Rent Registry System should be created where landlords can register their units with the city.

8. New Home buying programs should set higher performance goals and be expanded to include city-initiated/supported community land trusts.

Facilitating home ownership by low-income residents is an important means to create wealth that can lift people out of poverty. The current EHE stated goal for the First-Time Homebuyer Assistance proposed is to assist one family a year, which is extremely insufficient. We request that this target be set higher for this important effort. A proven program nationwide that can offer opportunities for ownership/wealth creation for low-income families is through Community Land Trusts (CLTs). We request that the EHE commit to collaborating with CLTs and developing programs for affordable housing development.

The member organizations of the Escondido Community Housing Coalition are committed to working with you and your staff to achieve housing goals for the city. Our coalition will continue to reach out to other organizations with an interest and expertise in housing. We understand that these issues are complex and need discussion and analysis and we look forward to an on-going process. We appreciate your consideration of these recommendations.

Sincerely,

Natasha Howell, Chair Housing Committee
Rob Jenkins, First Vice-President
North San Diego County NAACP

Yusef Miller, Director
North County Equity and Justice Coalition

Estela De Los Rios, Executive Director
CSA San Diego Fair Housing

Madison Coleman, Policy Advocate
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Laura Hunter, Chair Conservation Committee
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Evelyn Langston, President
Escondido Mobile Home Positive Action Committee (EMPAC)

CC.

Sean McGlynn, City Manager

Karen Youel, Housing and Neighborhood Services Manager