

February 21, 2022

Chair Barba and Planning Commission
City of Escondido
Via Email



RE: Sierra Club North County Group (NCG) comments on Draft Community Outreach and Engagement Plan for 2022 General Plan Amendments

Dear Chair Barba and Commissioners,

Sierra Club North County Group (NCG) has reviewed the Community Outreach and Engagement Plan and would like to make the following suggestions for its improvement. On the whole, it has much to commend it and far exceeds past efforts on community engagement that we have seen at the city. It incorporates many excellent actions that have been missing in past efforts.

It is timely too. An excellent Community Outreach and Engagement Plan is critical now because the two areas needing General Plan elements/amendments are two of the most important areas to the future of the city.

Comments on Environmental Justice Outreach

1. A major comment we have is that, especially with the environmental justice element, it needs to be very clear that the whole point of identifying environmental justice communities is for the city collaborate with impacted residents to establish policies and actions to remove or remedy the injustices that a specific community is facing. In both the plan and in public presentations, we strongly urge the staff to make sure it is well understood that the point of all of this is to set policies **for action** to address the harm.

The Outreach Plan says this on page 4, but it should be elevated for the reader. On page 8, more of a focus on action could be included. The EJ element it should be more than just (although important) 'engagement that is meaningful and equitable'. It should also be about establishing those priority actions that the city intends to take when identified by the residents.

Other ways to strengthen this message is to include another bubble on page 6 that addresses, *"Purpose of environmental justice element is to commit to policies, objectives, goals, and actions to reduce the disproportionate health and social burdens in most impacted communities by means that include the reduction of pollution exposure.....etc"*

One page 5, we recommend the text be amended to state, *'...This updated chapter will include new environmental justice goals, policies, and objectives, and identify environmental justice communities within the city and include actions to reduce environmental injustices in these communities.'*

Another potential place to elevate the action component is on page 8 to bold the words “...effort to rectify the disproportionately high and adverse effects on the health and environmental wellbeing on low income communities and communities of color...”

Last, it may be helpful to include specifically in the document that the adopted Climate Action Plan included many of these neighborhoods as *Priority Investment Neighborhoods*-where the intent was where the need and risks were greatest and funding should be invested first to reduce negative impacts of climate change.

2. We support the inclusion of the text acknowledging the historical role of those in power, including government and corporations, which created and upheld deeply inequitable structures. Ultimately, the specific history of inequities, voter disenfranchisement, and discriminatory actions of Escondido should be included in the discussion of environmental justice, housing element, and elsewhere in the General Plan.
3. Thank you for translating draft and final document into Spanish!
4. NCG recommends that a focus on indigenous and tribal communities have a specific effort beyond just the required SB 18 consultation.
5. NCG strongly supports inclusion of the Figure 1 chart of the *Spectrum of Community Engagement to Ownership*. This spectrum makes easily transparent what kinds of activities government should engage in itself to truly move in the direction of true representational government.
6. NCG recommends that the city add a key outreach element to hire community educators or a currently active NGO to conduct personal outreach and education throughout the development of the environmental justice element. One of the most effective communication models used by many other environmental justice communities is the promotora model. We strongly encourage the city to include local and state environmental justice networks like Environmental Health Coalition and the California Environmental Justice Alliance in your interviews and as reviewers and consultants.
7. NCG recommends that ‘walking audits’ such as are conducted by the Healthy Escondido Coalition and others are included in the neighborhood specific workshops or (maybe a better name) listening sessions.
8. Page 19, Open Houses within Specific Communities, should add solicitation from residents of additional information and actions they would like to see occur to address problems. The alternative scenarios should be co-created with the residents.
9. NCG is simply thrilled to see the inclusion of the intent for creation of an Environmental Justice Advisory Group comprised of individuals who live and work in environmental justice communities.

Comments on Safety Element Outreach

10. While the environmental justice background discussion specifically calls out impacts to residents in the 'sphere of influence', it is not as clear that the safety element does for all related risks, including fire, flood, extreme heat. Residents in the Escondido sphere of influence and environs are *significantly* at risk from policies and actions that the city does, or does not, take. From proposed expansion of the urban-wildland interface and those significant associated risks, to proposals to condemn a portion of Felicita Park for increased concentration of storm water flows, city actions can be very significant on surrounding areas. Please include these residents in your plans.
11. NCG recommends that the city also conduct in-neighborhood meetings with residents living on the front line of wildfire risks. These include the neighborhoods on the far reaches of the city, including but not limited to Rancho Vistamonte, Lomas Serenas, Quiet Hills, Summer Creek, Sonata, Mountain Meadow, Cloverdale, Hidden Trails, Kaywood, San Pasqual Valley residents, San Diego Safari Park, and many others.
12. Again, we hope the goal is to identify actions the city will take to reduce public safety risks.
13. The new safety element should also commit to establishing the likelihood of wildfire based on historic fire history. As we enter a new climate reality, the impacts of fire, flooding, food insecurity, and extreme heat events will increase and significant new policies and actions need to be developed and committed to.
14. Another 'bubble' page like page 6 should be developed for the Safety Element. The core concepts could include definitions or short blubs about what 'hazards' are, how climate change will worsen conditions, define resiliency and adaptation, heat islands, etc...

We are very encouraged by the starting point for the Community Outreach and Engagement Plan. We request that the Planning Commission make recommendations to make it even stronger.

Sincerely,

Laura Hunter, Chair
Sierra Club NCG Conservation Committee

cc. Veronica Morones, Senior Planner