



August 9, 2022

Ms. Veronica Morones
Senior Planner
City of Escondido
Via Email vmorones@gmail.com

RE: Sierra Club North County Group recommendations for Escondido's first Environmental Justice Element

Dear Ms. Morones,

Sierra Club North County Group (NCG) is submitting these comments for items to be evaluated for inclusion in the up-coming Environmental Justice Element.

1. Implementing policies and action from the ECAP

Escondido took an excellent step to promote environmental justice in the Climate Action Plan (ECAP). The designation of Priority Investment Neighborhoods (PINs), Energy Equity Plan, Climate Ambassadors, significant expansion of the urban forest to relieve heat islands and improve health, adaptation measures, transportation, and creation of the Climate Commission support environmental justice and should be included in the EJ Element policies. Without repeating them verbatim, they are summarized in Attachment A to this letter. We request these commitments be included in the Environmental Justice Element (EJE).

2. Adapt and include policies from the Environmental and Housing Justice Policy Platform

An invaluable document has been release by the California Environmental Justice Alliance (CEJA) titled, [Environmental and Housing Justice Policy Platform](#). The Policy Platform has many relevant policy recommendations that are applicable to Escondido. We hope the city will review this document and adapt from it those policies that will strengthen this EJE as it related to housing.

We have made suggestions below regarding how these policies might be added to the EJE.

A. Safe Siting of Housing and Sensitive Uses

The Policy Platform speaks to promotion of healthy land use compatibility and ensure housing is not sited on or near toxic or polluted land.

We are asking all land-use planning entities to require that all residential and sensitive uses be moved at least 500-feet from the freeway. We are very concerned about locating any residents within this distance. All the evidence shows that development locations within 500 feet of a major freeway or heavily trafficked road are hazardous for human health and should not be used to house vulnerable residents. The California Air Resources Board (CARB) released 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.¹

While not a regulation, this guidance is heavily based on extensive science that underpins the recommendation and should be adopted as part of good planning. In fact, the hazard area is 1,000 feet from a freeway, which would be a more healthful buffer to adopt.

Then, in 2017, a CalEPA and CARB Technical Advisory was issued which cited evidence that the risks were actually higher than the 2005 report found. It states,

*In spite of past successes and ongoing efforts to improve near roadway air quality in California, exposure to traffic pollution is still a concern because pollution concentrations and exposure levels near high-volume roadways continue to indicate that there is a lingering public health concern. In addition, the Office of Environmental Health Hazard Assessment (OEHHA) recently revised its methodology for risk assessment in order to estimate more accurately the health impacts of exposure. **This reanalysis has resulted in a revision of cancer risks from exposure to toxic air contaminants, including those emitted by transportation-related sources, to significantly higher levels...** (emphasis added)*

*These recent studies highlight the importance of protecting at-risk populations/communities from traffic emissions and indicate that exposure reduction strategies may be needed to protect **people that live and spend time in environments that are more than 500 feet from high volume roadways.**² (emphasis added)*

Further, they found that the air quality concerns will persist even with changes to regulations and technology.³

The Advisory does discuss the kind of development and measures that may be appropriate for these locations.

¹ *Air Quality and Land Use Handbook: A Community Health Perspective*, April, 2005
<https://ww3.arb.ca.gov/ch/handbook.pdf>, page 4

² Technical Advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways* https://ww3.arb.ca.gov/ch/rd_technical_advisory_final.pdf, page 14

³ Ibid

... In fact, planners and developers may want to consider siting non-sensitive uses and developments that will be primarily used and occupied during the daytime—such as commercial uses and offices. ... commercial and office buildings are often equipped with indoor filtration systems that can remove particulates from the air inhaled by building occupants, and these buildings are more likely to have permanently closed or sealed windows. This means that, when these buildings are sited close to roads, people that spend time in them are less likely to breathe harmful pollutants and experience negative health impacts.⁴

This guidance is important for the city to have as this issue is not well understood at the staff and elected level. A recent housing project was located right next to the freeway (Nutmeg) and several housing sites in the Housing Element are designated in these unsafe locations.

B. Advance Smart Growth and Avoid Sprawl

Policies in both the EJE and Community Safety Elements should proactively develop green infrastructure in most impacted areas and remove sprawl development areas to refocus scarce public resources into existing development footprint.

- Create connectivity between people’s homes and the places where people need to go by ensuring all communities have access to safe, reliable, affordable, and clean public transportation, active transportation networks, and shared mobility options. Solutions should be well-designed to reduce private vehicle use and guard against sprawling development patterns.
- Establish sustainable growth strategies and restrictions on development coupled with strong anti-displacement protections for housing, to prevent development in greenfield areas and limit environmentally degrading urban sprawl while also guarding against neighborhood gentrification and displacement.
- Contain a strong policy and action plan for tree planting and urban greening of heat island areas and ensure that walking, biking, and play areas are shaded so they can be used even in the summer.
- Tree equity (discussed later) is one metric that could be used to evaluate success in promoting urban greening.

C. Climate resilient and energy efficient housing

Creation and promotion of climate-resilient housing policies should be included in the EJE beyond the commitments in the ECAP. One area where the ECAP failed to include community input was the area of existing building retrofits. This is the veritable ‘low-hanging fruit’ of building GHG reduction. A robust energy efficiency could improve health and quality of existing housing stocks, save residents money, improve their health, and create good, green jobs. We hope that the EJE can gain some ground through aggressive and broad design of the Energy Equity Plan committed to the ECAP.

⁴ Ibid

- Upgrades to existing housing need to happen at scale while ensuring accessibility for the most vulnerable communities, especially renters and mobile homeowners or renters. Establish and increase funding for programs that provide climate and natural disaster-resilient retrofits for affordable rental housing and low-income homeowners.
- Advance housing electrification and solarization funding, incentives, and programs targeted to low-income communities and communities of color to reduce indoor air quality hazards and support a just energy transition.
- Sierra Club NCG requests that significant grant writing and/or Community Energy Alliance revenues be directed to this issue.

D. Anti-displacement policies and increased affordable housing creation are a high priority for the EJE.

Escondido has a dire need for affordable housing. The most recent Housing Element report found that, in the 5th Housing cycle, Escondido exceeded above-moderate market rate housing by 300 units. All other housing categories were **significantly** under-developed.

According to the report, Escondido has developed only 13.5% of requirements for very-low income, only 17% for low income, and only 15% of the goal for moderate, but 119% for above moderate market rate housing. These inequities in housing must be addressed where relevant in the EJE and Housing Element.

Since Escondido has a high percentage of renters, anti-displacement policies will be important to include and, again, we ask that an inclusionary housing ordinance or other housing requirements be added. Some of those suggested in the Policy Platform include:

- Policies that seek to revitalize and densify neighborhoods at risk of gentrification should be paired with strong inclusionary housing requirements, anti-displacement safeguards, and other protections for existing residents. Such policies should prioritize communities with high concentrations of rent burdened households.
- To accurately and equitably identify neighborhoods most vulnerable to gentrification, develop a community outreach process to meaningfully involve current residents in the creation of maps that reflect their lived experiences on the ground.
- Pair incentives for multifamily decarbonization and weatherization upgrades with anti-displacement measures. Examples include covenants requiring landlords who receive grants to maintain affordable rents, or pairing building retrofit funds with affordable housing acquisition funds to convert distressed or vacant properties into climate resilient housing. Invest in climate-resilient infrastructure for underserved communities.

3. Address food insecurity by implementing elements of the San Diego County Food Vision 2030

The San Diego Food Systems Alliance has developed a food justice vision that the Escondido EJE can help implement. Its goals are to [Cultivate Justice](#), [Fight Climate Change](#), and [Build Resilience](#). The Food Vision has well developed objectives, many of which are highly relevant in areas of Escondido. More information can be found at these links.

- [Preserve Agricultural Land and Soils, and Invest in Long-term Food Production](#)
- [Increase the Viability of Local Farms, Fisheries, and Food Businesses](#)
- [Scale Up Local, Sustainable, and Equitable Food Value Chains](#)
- [Elevate Wages and Working Conditions, and Improve Career Opportunities](#)
- [Expand Integrated Nutrition and Food Security](#)
- [Improve Community Food Environments](#)
- [Scale Up Food Waste Prevention, Recovery, and Recycling Initiatives](#)
- [Increase Leadership by Black, Indigenous, and People of Color Across the Food System](#)
- [Build a Local, Sustainable, and Equitable Food Movement](#)
- [Plan for a Resilient Food System](#)

For example, the Food Vision reports, *approximately 1 in 3 San Diegans experience nutrition insecurity. Black, Indigenous, and people of color are disproportionately impacted by food insecurity...Food and nutrition insecurity are rooted in poverty and inequality and San Diego County has the third highest number of people living in poverty of any county in California, with Black, Indigenous, and people of color most disproportionately impacted.*

The Vision also states that, *Efforts to increase healthy food access often undermine the resources and potential that already exists within communities. Supporting smaller, ethnic, and independently owned stores with financial, marketing, and technical assistance along with community-led initiatives, including gardens, farmers markets, mobile markets, and food hubs, provide much better solutions for addressing disparities and meeting community needs than the addition of supermarkets and large grocery stores.*

The Food Vision also discusses the need to create food system resilience plans. It states, *preparing for an uncertain future requires planning. To strengthen the public safety net and ensure that all are fed during future crises, it will be essential to create a food emergency and disaster plan for San Diego County.* This issue is also a cross-over issue with the Community Safety Element as well.

Further, like Chula Vista and San Diego have done, designation of an **Urban Agriculture Incentive Zone**⁵ program offers a property tax incentive to encourage urban ag in specific neighborhoods. Landowners can lease parts of their land to an urban ag project. This could be adapted for Escondido's situation and neighborhoods.

⁵ [Urban Ag 101](#) p.7

There are many workable and important objectives in the Food Vision that resonate with the needs of our most impacted neighborhoods and also align with goals in the ECAP. A dedicated section of the EJE should include policies and actions to include actions from the Food Vision to improve the health and well-being of residents and implement important commitments of the ECAP.

4. Assess and focus restoration on Escondido Creek and other heat island areas in most impacted areas.

Map 10 of Appendix F of the ECAP demonstrates the most 'heat vulnerable' areas.⁶ Closer examination demonstrates that areas along Escondido Creek and neighborhoods near S. Center City Pkwy are lacking tree canopy or other cooling measures. Trees, shrubs, and cooling centers are needed to be targeted in these areas. Restoration, increases in natural stormwater measures, aggressive tree and large shrub planting in these areas could address heat-related stresses on residents here.



5. Embed equity and center community voices in decision-making

Maybe the most important thing an EJE can do is ensure that impacted residents have a voice and agency in the decisions that affect them. The Policy Platform makes the following policy recommendations that should be considered and added.

- When making plans and decisions related to housing and land use, local governments should facilitate democratic and participatory processes that center the voices and needs of low-income and BIPOC residents who are most vulnerable to displacement and climate disasters. Such processes require:
 - cultivating trust between local decision-makers and residents to promote collaborative decision making, and
 - sufficient budgets for community-driven planning activities
- Develop formal partnerships with community-based organizations, particularly grassroots base-building groups that serve impacted community residents, to co-lead successful community engagement and planning efforts.
- Develop long-range planning documents in collaboration with sensitive and EJ community residents to integrate their needs and experiences to shape effective housing policy. Plans should develop meaningful metrics to assess the effectiveness of their engagement efforts and implementation progress of their long-range plans.
- Require housing developers to inform local residents in locally-spoken languages about the potential impacts of their projects on the surrounding community and provide channels for residents' concerns and feedback.

⁶https://www.escondido.org/Data/Sites/1/media/PDFs/Planning/ClimateActionPlan/Final/ResolutionExAEscondidoCAPXAppendixFEscondidoCAPAdaptationTechnicalDoc_10.21.20.pdf

- Ensure equitable access to public information and meetings related to a proposed development by using means of communications that are accessible to all residents (such as providing notices and other materials in locally-spoken languages, recruiting multilingual and culturally competent outreach workers, scheduling meetings in areas and at times that maximize attendance and accessibility, and provide interpretation during meetings).
- Reject policies that shorten public comment periods and undermine full consideration of residents' input.

6. Outreach to residents in impacted areas.

We filed a comment letter on the outreach plan on February 21, 2022. However, we would like to underscore a couple recommendations here.

- 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. It is also possible to combine this outreach with the commitment the city made to establishing a program for 'Climate Ambassadors'.
- 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.
- We recommend that the proposed open houses within specific communities 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.
- NCG strongly supports creation of an Environmental Justice Advisory Group comprised of individuals who live and work in environmental justice communities.

Public participation strategies will be key. We offer two recent examples of Escondido public engagement; one of a best practice and one of a worst practice. The best example where the city was moving in the direction of accessibility and inclusivity was the 2022 redistricting public process. Meetings were held at different times in community accessible places, in-person and full participation to remote attendees was accommodated with translation offered for most of the sessions.

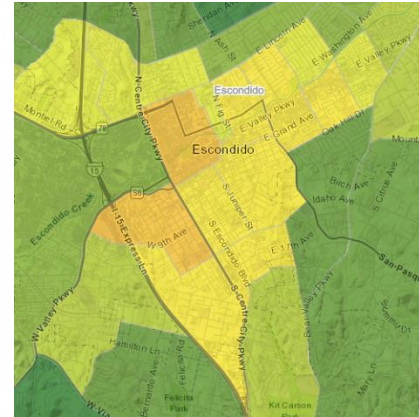
The worst example is the decision of the city to hold a critical visioning workshop to discuss the future of the city at the Police Station. This is a location that is intimidating to many people, not well-known to the public. The public can have no confidence that the Council intends a meaningful public process in this example.

7. Identifying communities with environmental justice needs.

An important part of the Environmental Justice Element will be designation of most impacted areas needing health and environmental related actions. While there is no

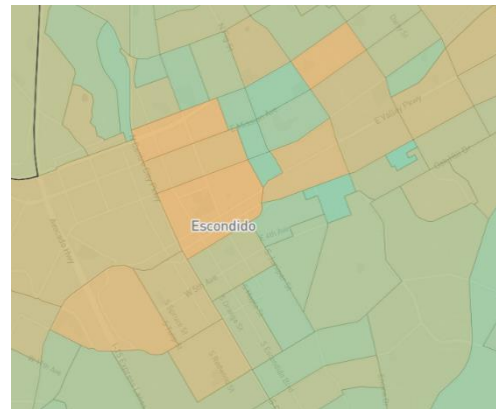
substitute for consulting with and listening to residents in impacted areas, there are more and more data sets and mapping tools that can help with identification of health and environmental issues.

1. **CalEnviroscreen** – This tool was used for designation of the Priority Investment Neighborhoods for the Escondido Climate Action Plan and is a good place to start. The new version 4.0 has been released. Sierra Club NCG recommends that neighborhoods with a CalEnviroscreen score of over 50 be included in the analysis for designation as a community with environmental justice needs.



2. **Healthy Places Index 3.0** was created by the Public Health alliance of Southern California in order to advance healthy equity through open and accessible data. The data can be accessed [here](#) and search for any city or place in California to view the community conditions. The data set include policy actions areas such as economic, education, social, transportation, neighborhood, housing, clean environment, and healthcare access.

3. **Tree Equity Score**- The Tree Equity Score (TES) TES calculates scores based on how much tree canopy and surface temperature align with income, employment, race, age, and health factors in the U.S. Each score indicates whether there are enough trees in specific neighborhoods for everyone to experience the health, economic and climate benefits that trees provide. TES utilizes a science-based approach to determine the tree canopy cover needed in a neighborhood to ensure the people living in urban areas benefit from everything trees provide. The website also include canopy recommendations to get to a protective level. [Escondido's TES is here.](#) The census tracts with the lowest scores here should be considered to have a high vulnerability to intense heat and air pollution impacts. The more orange the color, the less tree equity is present.



In conclusion, we are very committed to a strong and proactive environmental justice element for the city of Escondido. We offer these comments in order to elevate the many issues in the city and to offer solutions to address them.

Thank you for your consideration,
Laura Hunter, Chair
Sierra Club NCG Conservation Committee

ATTACHMENT A
Community Supported Measures included
in the 2021 Escondido Climate Action Plan Update (ECAP)

Social Equity

- Elevation of social equity and use of Cal EnviroScreen data to designate Priority Investment Neighborhoods (PIN's) for early action and investment.
- Creation of Climate Ambassadors program
- Establish a 'Clean Energy Equity Plan' to improve equitable access to clean and sustainable energy in priority investment neighborhoods ("PINS") to increase EV ownership, EV car-sharing, installation of EV chargers in existing multi-family projects, etc. Plan will also support low-income residents and small organizations to purchase or obtain RE. Program to include specific goals of local and decentralized RE, rental and homeowner programs and or system incentives, creation of local green jobs, and local hiring requirements etc.. Include a green jobs component and potentially local home retrofit program.
- 35% Tree Canopy cover in PINs
- Clean energy and clean transportation priority for PINs
- Commitment to coordinate on free Youth Passes and Electric Buses

Energy

- Achievement of 100% renewables and zero-carbon energy by 2030
- Evaluate feasibility of local home retrofit program and utilize the Clean Energy Equity Plan for reinvestment in PINS, focusing on the oldest housing stock.
- 'Envisions' carbon neutrality by 2045

Solid Waste

- Zero Waste Plan
- 90% waste diversion goal
- Organic waste recycling and composting and waste diversion ordinance.

Natural Systems

- Adopt Urban Forestry Program with a goal of having one tree per resident by 2088.
- Inclusion of CAL Fire funding application
- Focus on riparian zones by improving the JRUMP and calling out partnerships for restoring riparian and habitat areas
- Adaptation focus on local food sourcing and community garden support
- Tree coverage of 25% in residential areas and 15% in commercial and industrial areas.
- Encourage urban agriculture with edible landscapes
- Plant 1,100 trees by 2030
- Target stream restoration programs and riparian restoration strategies for carbon sequestration, natural heat relief, WQ improvement, and/or wildlife habitat mitigation.

Transportation

- Implement an intra-city shuttle system with electric shuttle
- Pursue stable funding sources and financing strategies to accelerate and sustain natural and green infrastructure within the public right-of-way.
- Procurement policy for converting all municipal vehicle fleet to EVs and PHEVs.

- Adopt a citywide Transportation Demand Management Plan.
- Adopt an Active Transportation Plan that Ordinance that includes an update to the City's Bicycle Master Plan, a cityside Pedestrian Master Plan, update City Trail Master Plan, Save Routes to school and safe routes to transit Plan, and ID PINs for improvements.

Oversight and Implementation

- Creation of a Community Climate Commission to oversee the implementation of the ECAP.
- Designation of a full-time Sustainability or Climate Coordinator to lead planning and coordination, FTE staff to implement
- CAP Update every five years
- No reliance on an offset program to meet GHG reduction goals

List of Ordinances, Programs, and Policies

- Community Garden Ordinance
- Open Space Conservation Program
- Update to Jurisdictional Runoff Management Plan to develop stream and riparian restoration project and work to naturalize and/or protect creek watershed areas.
- Procurement policy for converting all municipal vehicle fleet to EVs and PHEVs.
- Adopt a citywide Transportation Demand Management Plan.
- Adopt an Active Transportation Plan that Ordinance that includes an update to the City's Bicycle Master Plan, a cityside Pedestrian Master Plan, update City Trail Master Plan, Save Routes to school and safe routes to transit Plan, and ID PINs for improvements.
- Urban Heat Island reduction program
- Adopt a Zero Net Energy ordinance for commercial developments
- Remove development potential for at least 400 residential units on open space areas by 2035.
- Ordinance to require installation of electric cooking appliances and alternatively-fuels water heaters.
- Establish incentives for landlords and homeowners to upgrade to electric cooking and electric heat pumps.
- Organic waste recycling and composting and waste diversion ordinance.
- Zero Waste Plan