



August 6, 2023

Chair Paul and Planning Commissioners  
Escondido Planning Commission  
Via Email

**RE: Sierra Club North County Group SUPPORT for a strong and protective Environmental Justice Element for Escondido.**

Dear Chair Paul and Planning Commissioners:

Sierra Club North County Group (NCG) is in full support of a strong Environmental Justice Element for the city of Escondido. An Environmental Justice Element (EJE) is critically important for achieving equity and justice in our community.

Sierra Club NCG fully supports the methodology and analysis described in the excellent *Environmental Justice Background Report* dated July 22.

NCG recommends that policies implementing the following goals be included in the Escondido Environmental Justice Element.

- 1. Environmental Justice Element should include a true public engagement committee(s) which reflect issues relevant to impacted and vulnerable residents.**

Escondido does not provide adequate public participation for the most impacted residents. Local residents have requested, repeatedly through the Escondido Community Housing Coalition of which we are a member, the creation of a Housing Commission where the public could provide input and support around housing issues. In addition, the Climate Action Plan (CAP) requires the creation of a Climate Commission as yet un-created.

One of the most important actions an Environmental Justice element can implement is to ensure that impacted residents have a voice and agency in the decisions that affect them. For example, due to a high percentage of Spanish speakers in Escondido, Spanish-language or commitment to language interpretation should be key to this policy. Commissions/Working Groups that have public membership, meet regularly, at times the public can attend, offer education and input opportunities, and offer Spanish and other relevant language interpretation are imperative to facilitate this goal. The sample policies around Civic Engagement from other local cities should be built upon and strengthened.

**2. Environmental Justice Element policies should reduce pollution burdens for most impacted communities and avoid location of housing/or RHNA sites within 500 feet of a freeway and other major pollution sources.**

The EJE should contain several policies to reduce pollution burdens on already heavily burdened residents. For example, 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) 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.*<sup>1</sup>

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. The National City EJE has a policy on this topic contained in the sample policies.

In addition, tree planting programs and commitments should be made to ensure that residents enjoy the benefits of shade and cleaner air that trees can produce.

**3. Environmental Justice Element should prioritize and fully implement Affirmatively Furthering Fair Housing commitments throughout the city.**

Since Escondido has a high percentage of renters, anti-displacement policies and increased affordable housing opportunities will be important to include in the EJE. These will include designation of neighborhood needing the most investment and those communities with high concentrations of rent burdened households.

**4. Environmental Justice Element should prioritize climate equity and fully implement the Escondido Climate Action Plan.**

Environmental justice and addressing risks to the most vulnerable residents was at the forefront of the creation of the Escondido Climate Action Plan. As an adopted plan of the city, all policies relating to priority investment neighborhoods (PINS) and highly vulnerable communities should be included in the EJE. There is no reason to re-invent the wheel and, if implemented, the policies in the CAP will make a significant improvement to address environmental justice concerns.

To connect housing and climate action and resilience, the EJE element should adopt policies to further climate equity. The EJE could 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

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<sup>1</sup>AIR QUALITY AND LAND USE HANDBOOK: A COMMUNITY HEALTH PERSPECTIVE, April, 2005  
[https://ww2.arb.ca.gov/sites/default/files/2023-05/Land%20Use%20Handbook\\_0.pdf](https://ww2.arb.ca.gov/sites/default/files/2023-05/Land%20Use%20Handbook_0.pdf) page 4

affordable housing acquisition funds to convert distressed or vacant properties into climate resilient housing. Invest in climate-resilient infrastructure for underserved communities.

**5. Environmental Justice Element should adopt policies to remedy the gross deficiency in parks and green space in the environmental justice communities.**

The example provided on page 18 of the Background Report describes an unconscionable condition. The fact that there is almost 20 times less park access per residential unit in environmental justice communities is an appalling situation and must be remedied through proactive policies and implementation.

**6. Environmental Justice Element should 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 you will review this document and adapt from it those policies that will strengthen this Environmental Justice Element including, but not limited to, those recommendations that:

- a. Ensure strong tenant protections and services
- b. Advance Smart Growth with policies that proactively develop green infrastructure in most vulnerable areas and avoid sprawl.
- c. Creation and promotion of lead-free and climate resilient and energy efficient housing
- d. Achieve climate equity through transportation actions.

We appreciate the opportunity to comment on this very important issue. We urge the Planning Commission to seek a strong, protective, and effective Environmental Justice Element for the benefit of all residents of Escondido.

Sincerely,

*Joe Houde, Chair  
Sierra Club North County Group Executive Committee*

*Joaquin Aganza, Co-Chair  
Sierra Club North County Group Conservation Committee*