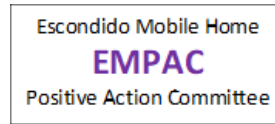




NORTH SAN DIEGO COUNTY
NAACP
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May 25, 2022

Ms. Sohab Mehmood, Department of California Housing and Community Development
 Ms. Veronica Morones, City of Escondido
 Via Email Sohab.Mehmood@hcd.ca.gov, VMorones@escondido.org

RE: Escondido Community Housing Coalition request for revisions to Escondido Draft Housing Element

Dear Ms. Mehmood and Ms. Morones:

The undersigned members of the Escondido Community Housing Coalition (EHC) are writing today regarding the new draft of the Escondido Housing Element. Since we have limited resources, we ask that this letter serve as our comment letter to the city on the new draft and our comment letter to Housing and Community Development (HCD) if no changes to it are made by the city.

As drafted, the EHC urges the city to make the following revisions and urges HCD to deny certification until three major amendments are made.

1. Housing Element should require development of an inclusionary housing ordinance.

Requirements for affordable housing in development is an **urgent** need for Escondido. There is no need to ‘wait and see’ if future projects yield adequate affordable housing. The failure of the 5th Housing Cycle is evidence enough that requirements are needed in this 6th cycle plan. The results of the 5th Housing cycle report showed Escondido has developed only 13.5% of requirements for very-low income, 17% for low income, and 15% of the goal for moderate, but 119% for above moderate market rate housing.

The development of Palomar Heights is also prime and recent example of Escondido’s failure to secure affordable housing. This project was located on an old hospital site, a perfect location in the center of the urban core and on transit corridors. The final project was significantly under density (by 500 units) with no deed restricted affordable housing. By now we know the future of affordable housing development in Escondido if an inclusionary housing (IH) ordinance is not in place.

EHC has been advised by Mr. Nico Calavitas, Professor Emeritus of Land Use Planning at San Diego State University regarding appropriate means to phase in inclusionary requirements. He suggests a reasonable dual approach, one based on IH applied to existing zoning, as in the case of typical IH ordinances, and the other based on plan changes or up-

zonings in areas slated for development (see attached article: “Inclusionary Housing, Incentives and Land Value Recapture”). IH requirements would be higher in the second case because land values would increase as a result of up-zonings, plan changes or updates.

In this case the IH requirements should be based on the public benefit received by the landowner (to be established on the basis of an economic analysis). This approach is preferable to density bonuses. The County seems to be moving in this direction. How land value changes up (up-zonings) or down should be an integral part of an IH study, including the desirability of a phasing approach to allow for land markets to adjust to plan changes and regulations.

2. Housing Element should include a true public engagement committee or commission.

Second, the element is still deficient in community participation and engagement around the important issue of housing. The Escondido Community Housing Coalition has repeatedly requested a re-start of the Housing Commission or a Housing Working Group as a place where housing issues can be studied, addressed, and improved. The cited Council Subcommittee, which meets during work hours, and has not (until recently) been noticed to the public is inadequate. In fact, the stated purpose of the Subcommittee in the new draft is “to discuss pertinent housing issues within the City and convey information to City staff on such matters.” Without any acknowledgement or commitment to engaging the public.

3. Please remove RHNA housing sites from areas adjacent to the freeway, a known high health hazard area.

Repeated commenters requested that housing be moved at least 500 feet away from freeways per Air Resources Board Guidance. The response of the city to move that issue to the Community Safety Element (CSE) update is not responsive. The risks are known now and we are concerned that these unsafe sites may be considered, ‘grandfathered’ in as it will be too hard to change the Housing Element once certified. This is a long known, existing problem and housing should not be located there. Please remove these locations.

In conclusion, ECHC strongly requests that the city amend or HCD reject this draft until these important aspects are improved.

Thank you for the consideration of our comments. Please communicate with us the results of your actions. We can be reached at escohousingcoalition@gmail.com.

Sincerely,

*Robert Jenkins, North San Diego County NAACP
Yusef Miller, North County Equity and Justice
Coalition, Clean Earth4Kids
Estela De Los Rios, CSA San Diego County
Madison Coleman, Climate Action Campaign
Yazmin Doroteo, North County Resident
Xochitl Castillo, Escondido Resident
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