

Comment Letter O5

**JH STARK COMPANIES**  
 2042 WALNUT AVENUE VENICE, CA 90291  
 310-292-2807

August 16, 2017

Ms. Kristin Blackson  
 Contract Planner  
 City of Escondido  
 201 N. Broadway  
 Escondido, CA 92025

RE: The Villages DEIR (Case No: ENV 16-0010; SUB 16-0009)

Ms. Blackson:

JH Stark Companies ("JHSCO") is a privately held residential development company with 25 years' experience in planning and building affordable housing in Southern California. We partner with local governments and public agencies to deliver housing opportunities for low and moderate income families as well as market-rate housing throughout California.

The current 2013-2020 regional housing needs allocation ("RHNA") for very-low, low and moderate income individuals in the City of Escondido is 2,566 units. Per the most recent annual housing element progress report, a mere 48 units affordable to the aforementioned income groups have been permitted in the first four years of this RHNA cycle.

Currently, The Villages project includes no affordable housing. As such, we urge the City to consider the inclusion of affordable units within The Villages project. In our experience, State Density Bonus Law ("SDBL") provides a real opportunity to create badly needed affordable units while maintaining the overall financial viability of the market rate component of a project.

Upon review of the project site, local density bonus ordinance, general plan and zoning code we believe that at least 100 affordable units can be accommodated on the site. Coupled with 566 market rate units, including these 100 affordable units would result in a financially feasible development proposal with a total of 666 units.

Further, given the in-fill nature of the project site, existing infrastructure, proximity to transit, shopping and other services we believe this site is ideally suited to assist the City in meeting its RHNA needs for low income households.

Thank you for allowing us to comment on the draft EIR.

Sincerely,



Jay Stark, President

O5-1

O5-2

O5-3

## Response to Comment Letter O5

**JH Stark Companies**  
**Jay Stark**  
**August 16, 2017**

**O5-1** The City of Escondido notes that the comment provides factual background information and does not raise an environmental issue within the meaning of the California Environmental Quality Act. Therefore, no further response is required. The City will include the comment as part of the Final Environmental Impact Report for review and consideration by the decision makers prior to a final decision on the Project.

**O5-2** The City acknowledges the commenter's request for consideration of affordable housing. The Project, as proposed, includes a range of unit sizes for varying housing sizes, incomes, and lifestyles, which can assist entry-level, workforce, or senior housing needs. The Project would accommodate anticipated population growth as projected by the San Diego Association of Governments, the region's agency responsible for growth projections used by other cities and agencies in the planning of growth and infrastructure. The Project accommodates anticipated growth to an underutilized infill site. The comment does not raise an environmental issue within the meaning of the California Environmental Quality Act. Therefore, no further response is required. The City will include the

	<p>comment as part of the Final Environmental Impact Report for review and consideration by the decision makers prior to a final decision on the Project.</p> <p><b>O5-3</b> The City acknowledges the commenter’s opinion that the site would be well-suited for affordable housing. The comment does not raise an environmental issue within the meaning of the California Environmental Quality Act. Therefore, no further response is required. The City will include the comment as part of the Final Environmental Impact Report for review and consideration by the decision makers prior to a final decision on the Project.</p>
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