

CITY COUNCIL STAFF REPORT

Public Hearing Item No. 14

August 11, 2021

File No. 0830-20

SUBJECT: 2021 – 2029 General Plan Housing Element Update (PHG 20-0030)

DEPARTMENT: Community Development

RECOMMENDATION:

It is requested that the City Council adopt Resolution No. 2021-110, approving the 2021 – 2029 General Plan Housing Element and associated amendment to the Community Health and Services Chapter of the General Plan. The Housing Element is one of the mandatory elements of the General Plan and is required by state law to be updated for the 2021-2029 planning period. The Community Health and Services Chapter of the General Plan is required to be amended to incorporate policies related to environmental justice. The recommendation also includes the adoption of the Third Addendum to the 2012 Final Environmental Impact Report for the Comprehensive General Plan Update, Downtown Specific Plan Update, and Climate Action Plan.

FISCAL ANALYSIS:

The 2021 – 2029 General Plan Housing Element includes a number of programs that must be implemented over the coming years related to housing production and monitoring. Many of these programs will be implemented through use of departmental budget (i.e., staff resources), while others will require other funding sources (grants, bonds, etc.). Due to the nature of a long-range planning program such as the Housing Element, actual funding needs have not been specifically identified at this time, however, staff will ensure that all available external funding sources are pursued.

Approval of the 2021 – 2029 General Plan Housing Element has no immediate fiscal impact on the City budget.

PREVIOUS ACTION:

On July 27, 2021, the Planning Commission voted 6 – 0 to recommend City Council approval of the 2021 – 2029 General Plan Housing Element Update and associated amendment to the Community Health and Services Chapter of the General Plan.

PROJECT SUMMARY:

The project consists of a General Plan amendment to update the City of Escondido's ("City") Housing Element for the 6th Cycle planning period from April 15, 2021, to April 15, 2029; and a General Plan text amendment to the Community Health and Services Chapter to address recent changes in state law with an expanded focus on environmental justice goals, policies, and objectives ("Project").

2021 – 2029 General Plan Housing Element

The Housing Element is a policy document designed to provide the City a coordinated and comprehensive strategy for promoting the production of safe, decent, and affordable housing within the community. The draft 2021-2029 Housing Element is attached as Exhibit “B” to draft Resolution No. 2021-110. Approving the Project would repeal in its entirety the 2013-2021 Housing Element and adopt in full new text, graphics, and figures comprising the 2021-2029 Housing Element of the General Plan.

General Plan Community Health and Protection Chapter Text Amendment

The Community Health and Services Chapter is an optional element to the General Plan. It promotes a community-based and private sector approach for establishing a sustainable and healthy community. The text amendment to the Community Health and Services Chapter is provided as Exhibit “C” to draft Resolution No. 2021-110. Approving the Project would incorporate the minor text amendment into the General Plan.

Future General Plan Community Protection Chapter Amendments

Amendments to the General Plan Community Protection Chapter are also required upon the adoption of the General Plan Housing Element, and will be brought back to the City Council for consideration as a separate project following consultation with the California Department of Forestry (“CDF”).

BACKGROUND:

The Housing Element is one of the eight mandatory General Plan elements, as articulated in sections 65580 to 65589.8 of the Government Code (“Housing Element Law”). Pursuant to Housing Element Law, the Housing Element has two main purposes: (1) to provide an assessment of both current and projected housing needs and constraints in meeting these needs; and (2) to state “goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing.” (Gov’t Code § 65583.) Thus, a Housing Element has become the official “planning” response to the need to provide housing and housing-related services for all economic segments of the community.

Recognizing that “the availability of housing is of vital statewide importance and that decent housing and a suitable living environment is a priority of the highest order,” the California Legislature adopted the Housing Element Law to ensure that cities and counties recognize their responsibilities in attaining these housing goals. The California Legislature placed responsibility on cities and counties to facilitate the improvement and development of housing for all economic segments of the community. Although Housing Element Law allows a city or county to maintain some degree of flexibility in adopting planning and zoning policies and ordinances, those policies and ordinances must be compatible with state housing goals and regional housing needs.

California Government Code section 65580 specifically declares the following regarding housing:

1. The availability of housing is of vital statewide importance, and the early attainment of decent housing and a suitable living environment for every Californian, including farmworkers, is a priority of the highest order.
2. The early attainment of this goal requires cooperative participation of government and the private sector to expand housing opportunities and accommodate the housing needs of Californians in all economic levels.
3. The provision of housing affordable to low- and moderate-income households requires the cooperation of all levels of government.
4. Local and state governments have a responsibility to use the powers vested in them to facilitate the improvement and development of housing to make adequate provision for the housing needs of all economic segments of the community.
5. The Legislature recognizes that in carrying out this responsibility, each local government also has the responsibility to consider economic, environmental, and fiscal factors and community goals set forth in the general plan and to cooperate with other local governments and the state in addressing regional housing needs.
6. Designating and maintaining a supply of land and adequate sites suitable, feasible, and available for the development of housing sufficient to meet the locality’s housing need for all income levels is essential to achieving the state’s housing goals and the purposes of this article.

Unlike other Elements to a General Plan, which typically have a 20 – 25 year horizon, the Housing Element is required to be updated every eight years to ensure relevancy and accuracy. Detailed background information on the project can be found in the July 27, 2021, Planning Commission staff report, which is included with this staff report as Attachment 1.

Pursuant to California Government Code section 65302(g), the City is required to update the Community Protection Chapter of the General Plan upon updating its Housing Element, to address goals, policies, and programs necessary to protect the community from hazards like wildfires and climate disruption. (The Community Protection Chapter will be amended subsequent to consultation with CDF.) Further, as a result of the requirement to update both the Housing Element and Community Protection Chapter of the General Plan, the City is also required pursuant to Government Code section 65302(h)(2) to integrate environmental justice goals, policies, and objectives into the General Plan. As

such, certain environmental justice goals, policies, and objectives are included with the proposed text amendment to the Community Health and Services Chapter of the General Plan. (Additional goals, policies, and objectives will be addressed as part of the Community Protection Chapter amendment.)

ANALYSIS:

The information below provides a summary analysis of the Project. More detailed analysis is provided in the July 27, 2021, Planning Commission staff report (Attachment “1”).

2021 – 2029 General Plan Housing Element

The City’s existing General Plan Housing Element covered the period of 2013 – 2021 (called the 5th Cycle planning period). The City has a 120 day grace period from the statutory deadline of April 15, 2021, to adopt its 2021 – 2029 Housing Element (the 6th Cycle planning period). Thus, the 2021 – 2029 General Plan Housing Element Update must be adopted and filed with the California Department of Housing and Community Development (“HCD”) no later than August 13, 2021. Failure to adopt the Housing Element by that date would subject the City to update its Housing Element on a four year cycle rather than an eight year cycle for at least two cycles.

A city’s Housing Element is required to provide (1) an assessment of housing needs and an inventory of resources and constraints relevant to the meeting of these needs (Government Code section 65583(a)); (2) a statement of the community’s goals, quantified objectives, and policies relative to the maintenance, preservation, improvement, and development of housing (Government Code section 65583(a)); and (3) a program that sets forth a schedule of actions during the planning period, each with a timeline for implementation of the policies and achieve the goals and objectives of the housing element (Government Code section 65583(c)). To address these requirements, the draft 2021-2029 Housing Element consists of the following major components:

- A profile and analysis of the City’s demographics, housing characteristics, and existing and future housing needs.
- A review of the real or potential constraints to housing production and preservation. Constraints include potential market, governmental, policy, and environmental limitations to meeting the City’s identified housing needs.
- An assessment of resources available to meet the City’s objectives regarding housing production and preservation.
- Strategies to address the City’s identified housing needs, including housing goals, policies, and programs, including changing housing needs, including preparation of a Regional Housing Needs Allocation (“RHNA”) plan (Government Code section 65584(a)).

A critical measure of compliance with Housing Element Law is the City's ability to accommodate its share of regional housing needs based on a RHNA prepared by HCD for each Council of Governments. The San Diego Association of Governments ("SANDAG") is the Council of Governments for the San Diego region and allocates to the 18 cities and the unincorporated area of San Diego County their fair share of the total RHNA housing needed for each income category. Overall, the region needs to plan for an additional 171,685 units. The City's share of the RHNA, based on several factors that including recent growth trends, income distribution, and capacity for future growth, is 9,607 new units during the 6th Cycle planning period. This allocation is divided into four income categories: very low, low, moderate, and above moderate. Of Escondido's total RHNA, 3,113 new units must be reserved for households in the low- and very low-income category.

Pursuant to Government Code section 65583, all cities must accommodate their RHNA by adopting land use plans that demonstrate a land inventory capable of doing so. A jurisdiction may meet the RHNA requirement using potential development on suitable vacant and/or non-vacant sites, and must document how zoning and development standards on the proposed sites facilitates housing to accommodate its RHNA. Government Code section 65863(c) requires the City to identify available sites to satisfy its RHNA obligations, and also establish procedures for the City to follow in the event that a site becomes unavailable. The draft 2021 – 2029 Housing Element includes a program to ensure that sufficient residential capacity is maintained by monitoring its sites inventory on a project-by-project basis. Through this program, the City will ensure that there is "no net loss" in its ability to accommodate the remaining need for housing in the low and very low income categories, and if necessary, will identify sufficient sites to accommodate that shortfall.

Since the adoption of the City's 5th Cycle Housing Element in 2012, several changes to Housing Element Law have taken effect which increase the state's ability to enforce Housing Element requirements through fiscal and regulatory means which would remove varying aspects of local control over how the city develops. Failure to abide by those requirements also risks the state imposing a more frequent update cycle on the City. The City's 2021 – 2029 Housing Element Update was prepared to comply with Housing Element Law, as amended, and all other federal, state, and local requirements, as necessary to demonstrate compliance with state law and gain state certification. To that end, the City has consulted with HCD on several occasions to ensure compliance. As of this writing, it is believed that the draft 2021-2029 Housing Element is in substantial compliance with specified provisions of Housing Element Law, however staff has not yet received confirmation of such from HCD. Subsequent to adoption of the 2021 – 2029 Housing Element, it will be submitted to HCD for certification. Should the City be made aware of any deficiencies, amendments to the 2021 – 2029 Housing Element will be prepared to achieve compliance and obtain certification.

General Plan Community Health and Protection Chapter

A text amendment to the Community Health and Services Chapter of the General Plan is needed in order to incorporate certain mandated environmental justice goals, policies, and objectives into the General Plan. Environmental justice goals are achieved when everyone in the City has the same degree of protection from environmental and health hazards; a healthy environment in which to live, learn, and

work; and equal access to the decision-making process. Environmental justice policies will be aimed at reducing health risks, promoting civic engagement, and prioritizing the needs of disadvantaged communities with implementable actions that achieve them.

Environmental justice goals and policies were developed primarily through the work achieved during the course of developing the 2021 Climate Action Plan, by identifying disadvantaged communities and demographics and conducting community outreach to better understand the unique and disproportionate challenges faced by these communities. Portions of Government Code section 65302(h) that relate to civic engagement are addressed in the proposed text amendment to the Community Health and Services Chapter of the General Plan. Reliance on the 2021 Climate Action Plan will guide the City's efforts to address issues related to public health, social equity, and environmental justice. (Note that other portions of Government Code section 65302(h) will be incorporated into the Community Protection Chapter of the General Plan as part of the future amendment to that chapter noted earlier in this report.)

PUBLIC INPUT:

The City undertook a public involvement process to help engage residents, businesses, and other community members in the development of three different housing studies and plans, including the 2021 – 2029 Housing Element Update, consolidated under a single work program, called the Housing and Community Investment Study ("HCIS"). On June 10, 2020, the City Council considered and endorsed a Public Participation Plan ("Outreach Plan") for that work program. Among other things, the Outreach Plan proposed a series of meetings with the Planning Commission to discuss different aspects and components related to the HCIS. The Outreach Plan can be accessed through the following link:

https://www.escondido.org/Data/Sites/1/media/PDFs/Planning/EastValleySpecificPlan2020/HCISPPP_June102020.pdf

The City has also developed and maintains a webpage that can be accessed at the link below to provide periodic updates and documents related to the HCIS:

<https://www.escondido.org/hcis.aspx>

Public participation played an important role in the formulation and refinement of the City's housing goals and policies and in the development of the Housing Element. Subsequent to publication of the first draft of the 2021 – 2029 Housing Element Update, the community was afforded an opportunity to review and comment on the proposed draft while it was being reviewed by HCD. This included at least five Planning Commission study sessions, as well as a presentation to the City Council. When a revised draft of the Housing Element was available for review and comment, in summer 2021, three virtual public meetings were held.

The new Community Health and Services Chapter programs and policies are drawn from the 2021 Climate Action Plan, which itself underwent an extensive public review process. That two-year process included extensive public involvement, input from the Environmental Community Advisory Group, and adaptation steering committees, along with Planning Commission and City Council hearings. The reliance and reference to that document, and inferred policy guidance, helps associate additional and valued outreach and engagement activities.

Public comments received as of this writing on the 2021 – 2029 Housing Element Update are included as Attachment 2 to this report.

ENVIRONMENTAL STATUS:

The 2012 General Plan Update, Downtown Specific Plan Update and Climate Action Plan Program EIR (“Final EIR”) was certified on May 23, 2012, by the Escondido City Council. Pursuant to CEQA, when taking subsequent discretionary actions in furtherance of a project for which an EIR has been certified, the lead agency is required to review any changed circumstances or new information to determine whether any of the circumstances under Public Resources Code section 21166 and CEQA Guidelines section 15162 require additional environmental review. City staff evaluated the Project, and all aspects of the changes, in light of the standards for subsequent environmental review outlined in Public Resources Code section 21166 and CEQA Guidelines section 15162. City staff concluded that the EIR fully analyzed and mitigated, where feasible, all potentially significant environmental impacts, if any, that would result from the revised Project, and therefore, no subsequent EIR or mitigated negative declaration is required. On that basis, City staff has prepared an Addendum, included as Exhibit “D” to draft Resolution No. 2021-110, for the changes, pursuant to CEQA Guidelines section 15164. Further information on the addendum can be found in the July 27, 2021, Planning Commission staff report. No further CEQA analysis is required at this time.

APPROVED AND ACKNOWLEDGED ELECTRONICALLY BY:

Adam Finestone, Interim Director of Community Development
08/04/21 5:37 p.m.

ATTACHMENTS:

1. Attachment “1” – July 27, 2021, Planning Commission staff report
2. Attachment “2” – Public Comments
3. Resolution No. 2021-110
4. Resolution No. 2021-110 Exhibits “A” through “D”



PLANNING COMMISSION

Agenda Item No.: **G.2**
Date: July 27, 2021

PROJECT NUMBER / NAME: PHG 20-0030 / 2021-2029 General Plan Housing Element Update, and General Plan Community Health and Services Chapter Amendment

REQUEST: Adoption of the 2021 – 2029 Housing Element Update and associated amendment to the Community Health and Services Chapter of the General Plan, and the Third Addendum to the 2012 Final EIR for the Comprehensive General Plan Update, Downtown Specific Plan Update, and Climate Action Plan.

LOCATION: CityWide

APPLICANT: City of Escondido

APN / APNS: N/A

PRIMARY REPRESENTATIVE:
Planning Division

GENERAL PLAN / ZONING: N/A

DISCRETIONARY ACTIONS REQUESTED: General Plan amendments

PREVIOUS ACTIONS: N/A

PROJECT PLANNER: Adam Finestone, AICP
Interim Director of Community Development
afinestone@escondido.org

CEQA RECOMMENDATION: Adopt a Third Addendum ("Addendum") to the 2012 Final Escondido General Plan Update, Downtown Specific Plan Update, and Climate Action Plan Environmental Impact Report.

STAFF RECOMMENDATION: Provide a recommendation to City Council to approve the Project.

REQUESTED ACTION: Approve Planning Commission Resolution No. 2021-10

CITY COUNCIL HEARING REQUIRED: YES NO

REPORT APPROVAL:

Adam Finestone, AICP
Interim Director of Community Development

ATTACHMENT "1"

Project Name: Housing Element Update

PHG 20-0030

Date: July 27, 2021

Note to the reader:

When used in relation to the Escondido General Plan, the terms "Community Health and Services Element" and "Community Health and Services Chapter" are interchangeable and refer to Chapter 5 of the Escondido General Plan. When used in relation to the Escondido General Plan, the terms "Public Safety Element," "Safety Element," "Community Protection Element," and "Community Protection Chapter" are interchangeable and refer to Chapter 6 of the Escondido General Plan.

A. BACKGROUND:

The California Legislature has determined that a primary state housing goal is to ensure that every resident has a decent home and a suitable living environment. To ensure adequate housing can be developed in a jurisdiction, a Housing Element is required as part of the General Plan. The Housing Element is one of the eight mandatory General Plan elements, as articulated in sections 65580 to 65589.8 of the Government Code ("Housing Element Law"). Pursuant to Housing Element Law, the Housing Element has two main purposes: 1) to provide an assessment of both current and projected housing needs and constraints in meeting these needs; and 2) to state "goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing." (Gov't Code § 65583.) Thus, a Housing Element has become the official "planning" response to the need to provide housing and housing-related services for all economic segments of the community.

The Housing Element portion of the 2012 Escondido General Plan provides the City with a coordinated and comprehensive strategy for promoting the production of safe, decent, and affordable housing throughout the community. The City of Escondido's 2012 Housing Element includes policies to promote the maintenance of existing housing and increase capacity for additional housing options so that existing and future housing needs of people living and working in the City of Escondido are met. The City's 2012 Housing Element was an eight-year plan for the 2013-2021 period (called the 5th Cycle planning period), which differs from the City's other General Plan elements that cover a much longer period. Because the 2013-2021 Housing Element covers only an eight year planning period, the City's 2013-2021 Housing Element is out of date and no longer satisfies statutory requirements. (While part of the General Plan, the Housing Element is updated more frequently to ensure its relevancy and accuracy.) To remain on an eight-year planning cycle, the City must adopt its Housing Element within 120 calendar days from the statutory due date of April 15, 2021, for the jurisdictions in the San Diego region (i.e., August 13, 2021). If adopted after this date, Government Code section 65588(e)(4) requires the Housing Element to be revised every four years until adopting at least two consecutive revisions by the statutory deadline.

Upon the adoption of the 2021-2029 Housing Element, the Public Safety Element portion of the General Plan is required to be updated pursuant to Government Code section 65302(g). The Safety Element, which is called the Community Protection Chapter in the 2012 Escondido General Plan, addresses potential and existing hazards in the City, which are outlined in the following categories: Emergency Preparedness, Geological Hazards/Seismic Activity, Flood Hazards, Hazardous Material and Mining Hazards, Public Safety Services and Facilities, Fire Hazards and Protection, and Severe Weather Hazards. Among other updates, additional categories for

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Climate Change Resiliency and Mitigation must be added. Further, because the Community Protection Chapter update is required to be updated concurrently with the Housing Element update, Government Code section 65302(h) requires the City to also either adopt an Environmental Justice Element or integrate environmental justice goals, policies, and objectives into other elements of the General Plan. Environmental justice is defined by the State of California as the “fair treatment and meaningful involvement of people of all races, cultures, incomes, and national origins with respect to the development, adoption, implementation, and enforcement of laws, regulations, and policies.” (California Government Code section 65040.12(e)). As such, environmental justice goals, policies, and objectives will be integrated into the City’s Community Protection Chapter and Community Health and Services Chapter.

The process related to preparing General Plan amendments provides jurisdictions with an opportunity to be strategic. It is a chance for cities and counties to articulate housing issues, take stock of housing resources and opportunities, and establish forward-thinking goals, policies, and programs to guide decision making through 2029. For the City of Escondido, this General Plan amendment work program:

- Discusses CityWide housing and population demographics, regional fair-share housing allocations, and implementation mechanisms;
- Continues existing City housing policy and updates policies as needed to meet State mandates;
- Reinforces the City’s commitment to affordable housing and ensures that affordable housing is added in many areas across the City and not concentrated in areas with lower access to amenities or near sources of pollution;
- Reinforces the City’s commitment to existing land use policies that limit or prevent housing development in areas with development constraints, such as agriculture and conservation lands, and to the extent feasible, fire and flood hazard zones;
- Reinforces and expands on programs to develop complete neighborhoods in mixed-use areas adjacent to transit opportunities and services;
- Identifies strategies for expanding housing opportunities and services for all household types and income groups;
- Affirmatively furthers fair housing and identifies environmental justice and social equity issues to support positive economic, educational, and health outcomes for target populations;
- Identifies vacant or under-developed sites, meaning sites with substantial unused land or development potential;
- Addresses the public safety and public health needs and concerns of its residents, businesses, and other community members, and sets forth a coordinated program for all potential natural and human-caused hazards;
- Addresses climate adaptation and resiliency strategies applicable to the Public Safety Element; and
- Provides the primary policy guidance for local decision-making related to housing;

B. SUMMARY OF REQUEST:

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PHG 20-0030

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The project consists of a General Plan amendment to update the City of Escondido's Housing Element for the 6th Cycle planning period from April 15, 2021, to April 15, 2029; and a General Plan text amendment to the Community Health and Services Chapter to address recent changes in state law with an expanded focus on environmental justice goals, policies, and objectives ("Project"). Additional General Plan text amendments that focus on environmental justice goals, policies, and objectives, and on planning for natural and human-caused public safety hazards, must be incorporated into the Community Protection Chapter to address recent changes in state law. However consultation with the California Department of Forestry and Fire Protection ("CDF") is required before those amendments can occur.

- The Housing Element is a policy document designed to provide the City a coordinated and comprehensive strategy for promoting the production of safe, decent, and affordable housing within the community. The proposed draft 2021-2029 Housing Element is attached as Exhibit "B" to draft Planning Commission Resolution No. 2021-10, which itself is attached to this report as Attachment 6. Approving the Project would repeal in its entirety the 2013-2021 Housing Element and adopt in full new text, graphics, and figures comprising the 2021-2029 Housing Element of the General Plan.
- The Community Health and Services Chapter, which is an optional element to the General Plan, promotes a community-based and private sector approach for establishing a sustainable and healthy community. The General Plan text amendment to the Community Health and Services Chapter is provided as Exhibit "C" to draft Planning Commission Resolution No. 2021-10. Approving the Project would incorporate the minor text amendment into the General Plan.
- The Public Safety Element (called Community Protection Chapter in the 2012 Escondido General Plan), identifies hazards and ways to reduce those hazards to guide local decisions related to zoning and development regulations. Policies and implementable actions may include methods for minimizing risks, as well as ways to minimize economic disruption and speed up recovery following disaster. As noted above, additional General Plan text amendments focusing on environmental justice, and those focusing on planning for natural and human-caused public safety hazards, are required as a result of the Housing Element update and will be incorporated into the Community Protection Chapter of the General Plan following consultation with CDF. It is anticipated that the Community Protection Chapter amendments will be brought before the Planning Commission in the fall for consideration and recommendation to the City Council.

C. SUPPLEMENTAL DETAILS OF REQUEST:

From time to time, cities tailor their goals, policies, and programs to create a local community that develops in a way that the local policy-makers desire. Cities use their "police power" to create laws that promote the general health, safety, and welfare of their citizens. In California, this doctrine is reflected in Article XI, section 7 of the California Constitution, which serves as the basic authority for cities to enact regulations and ordinances as long as they do not conflict with state laws. In many cases, the California Legislature has created only minimum frameworks for the

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exercise of regulatory powers. The nuances of the regulations are thus established at a local level.

The Planning and Zoning Law requires a city or county to adopt a General Plan for land use and development within its boundaries that includes, among other things, a Housing Element. Recognizing that "the availability of housing is of vital statewide importance and that decent housing and a suitable living environment is a priority of the highest order," the California Legislature adopted the Housing Element Law to ensure that cities and counties recognize their responsibilities in attaining these housing goals. The California Legislature placed responsibility on cities and counties to facilitate the improvement and development of housing for all economic segments of the community. Therefore, each city and county is required to work cooperatively with other local governments and the state in addressing regional housing needs. Although Housing Element Law allows a city or county to maintain some degree of flexibility in adopting planning and zoning policies and ordinances, those policies and ordinances must be compatible with state housing goals and regional housing needs.

California Government Code section 65580 specifically declares the following regarding housing:

1. The availability of housing is of vital statewide importance, and the early attainment of decent housing and a suitable living environment for every Californian, including farmworkers, is a priority of the highest order.
2. The early attainment of this goal requires cooperative participation of government and the private sector to expand housing opportunities and accommodate the housing needs of Californians in all economic levels.
3. The provision of housing affordable to low- and moderate-income households requires the cooperation of all levels of government.
4. Local and state governments have a responsibility to use the powers vested in them to facilitate the improvement and development of housing to make adequate provision for the housing needs of all economic segments of the community.
5. The Legislature recognizes that in carrying out this responsibility, each local government also has the responsibility to consider economic, environmental, and fiscal factors and community goals set forth in the general plan and to cooperate with other local governments and the state in addressing regional housing needs.
6. Designating and maintaining a supply of land and adequate sites suitable, feasible, and available for the development of housing sufficient to meet the locality's housing need for all income levels is essential to achieving the state's housing goals and the purposes of this article.

Each jurisdiction's Housing Element is subject to detailed statutory requirements, including a requirement to be updated every four or eight years, and mandatory review by the California Department of Housing and Community Development ("HCD") prior to adoption. The California Legislature has granted HCD the authority to promulgate detailed guidelines for the preparation of Housing Elements, and also determine whether a jurisdiction's Housing Element substantially complies with the requirements of state law. A finding of substantial compliance is often referred

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to as "certification" of the Housing Element. To maintain compliance with the state, the City of Escondido must have an adopted and certified Housing Element by August 13, 2021.

The goals, policies, and programs within the proposed draft 2021-2029 Housing Element relate directly to, and shall be consistent with, other elements of the General Plan. Pursuant to California Government Code section 65302(g), the City is required to update the Community Protection Chapter of the General Plan upon updating its Housing Element, to address goals, policies, and programs necessary to protect the community from hazards like wildfires and climate disruption. Further, as a result of the concurrent update to both the Housing Element and Community Protection Chapters of the General Plan, the City is also required pursuant to Government Code section 65302(h)(2) to integrate environmental justice goals, policies, and objectives into the General Plan. As such, certain environmental justice goals, policies, and objectives are included with the proposed text amendment to the Community Health and Services Chapter of the General Plan.

As noted previously, amending the Community Protection Chapter of the General Plan requires consultation with CDF. As soon as that consultation has concluded, the amendment to the Community Protection Chapter of the General Plan will be brought to the Planning Commission for consideration and recommendation to the City Council. The amendment will address goals, policies, and programs to protect the community from hazards such as wildfires and climate disruption, and will also incorporate additional goals, policies, and objectives to address environmental justice and social equity.

D. PROJECT ANALYSIS:

Housing Element

Pursuant to Government Code section 65583, a Housing Element is required to consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. Specifically, a Housing Element is required to contain the following:

- An assessment of housing needs and an inventory of resources and constraints relevant to the meeting of these needs (Government Code section 65583(a));
- A statement of the community's goals, quantified objectives, and policies relative to the maintenance, preservation, improvement, and development of housing (Government Code section 65583(a)); and
- A program that sets forth a schedule of actions during the planning period, each with a timeline for implementation of the policies and achieve the goals and objectives of the housing element (Government Code section 65583(c)).

The proposed draft 2021-2029 Housing Element consists of the following major components:

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- A profile and analysis of the City's demographics, housing characteristics, and existing and future housing needs.
- A review of the real or potential constraints to housing production and preservation. Constraints include potential market, governmental, policy, and environmental limitations to meeting the City's identified housing needs.
- An assessment of resources available to meet the City's objectives regarding housing production and preservation.
- Strategies to address the City's identified housing needs, including housing goals, policies, and programs, including changing housing needs, including preparation of a Regional Housing Needs Allocation ("RHNA") plan (Government Code section 65584(a)).

A critical measure of compliance with Housing Element Law is the ability of a jurisdiction to accommodate its share of the regional housing needs based on a RHNA prepared by HCD for each Council of Governments in the state that identifies projected housing units needed for all economic segments based on Department of Finance population estimates. The San Diego Association of Governments ("SANDAG") is the Council of Governments for the San Diego region and allocates to the 18 cities and the unincorporated area of San Diego County their fair share of the total RHNA housing needed for each income category. Overall, the region needs to plan for an additional 171,685 units. The City's share of the regional housing need for the 2021-2029 RHNA period is allocated by SANDAG based on several factors, including recent growth trends, income distribution, and capacity for future growth. Each local government must demonstrate that it has planned to accommodate all of its regional housing need allocation in its Housing Element.

Escondido's share of regional future housing needs is a total of 9,607 new units for the period of April 15, 2021, to April 15, 2029. This allocation is divided into various income categories, of which 3,113 new units must be reserved for households in the low- and very low-income category. The overall RHNA allocation process reflects a need for cooperation between both public and private sectors to expand housing opportunities that will allow for new housing development that benefits everyone in the community, such as a greater mix of housing types and choices. It allows local governments to maintain control over where and what type of development should occur in their communities, while allowing the private sector to meet market demand. While the Housing Element must contain a variety of community statistics to frame future housing needs, pursuant to Government Code section 65583, all cities must accommodate their RHNA allocations in their Housing Elements by adopting land use plans that accommodate the minimum number of housing units per their RHNA.

Housing Element Law requires that jurisdictions demonstrate in the Housing Element that the land inventory is adequate to accommodate that jurisdiction's share. A jurisdiction may meet the RHNA requirement using potential development on suitable vacant and/or non-vacant sites within the community. A jurisdiction must document how zoning and development standards on the proposed sites facilitate housing to accommodate the remaining RHNA requirement. Government Code section 65863(c) requires the City to identify available sites to satisfy its RHNA obligations, and also establish procedures for the City to follow in the event that a site becomes unavailable. To ensure that the City monitors its compliance with Government Code section 65863 ("No Net

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Loss”), the City will monitor the consumption of residential acreage to verify an adequate inventory is available to meet the City’s RHNA obligations. To ensure sufficient residential capacity is maintained to accommodate the RHNA, the City will develop and implement a formal ongoing (project-by-project) evaluation procedure pursuant to Government Code section 65863. If an approval of development results in a reduction of capacity below the residential capacity needed to accommodate the remaining need for lower income households, the City will identify (and, if necessary, rezone) sufficient sites to accommodate the shortfall and ensure there is “no net loss” in capacity to accommodate the RHNA. The City will maintain an inventory of available sites for residential development and provide it to prospective residential developers upon request. The parcel-by-parcel inventory is located in the Sites Inventory Appendix of the Housing Element.

Since the adoption of the City’s 5th Cycle Housing Element in 2012, several changes to Housing Element Law have taken effect. In particular, the state increased its ability to enforce Housing Element requirements, and the ability for interested persons to challenge the City’s compliance with Housing Element Law. Pursuant to Government Code section 65585, the state has a greater range of penalties that can be imposed for non-compliance, including the increased risk of exposure to a variety of fiscal and regulatory impacts, reducing local control over housing-related decision-making. Failure to comply also risks the state imposing a more frequent update cycle on the City. The City’s 6th Cycle Housing Element Update was prepared to comply with Housing Element Law, as amended, and all other federal, state, and local requirements, as necessary to demonstrate compliance with state law and gain State certification.

Housing Element Law requires that HCD review local housing elements for compliance with Housing Element Law and report written findings to the local jurisdiction. State law requires that draft Housing Element amendments be submitted to HCD for review at least 60 days prior to adoption. Escondido’s draft 2021-2029 Housing Element, dated March 18, 2021, and included as Attachment 1 to this staff report, was submitted to HCD on March 26, 2021. City staff and its consultant team had informal discussions with HCD staff on April 30, 2021, regarding the submittal and its content. City staff and their consultant team clarified many questions by phone, but HCD also asked the City to submit topical revisions to HCD staff on May 11, 19, and 24, 2021, in an attempt to resolve all issues and see the changes in writing. Despite these changes, HCD determined that there were still outstanding issues. HCD’s formal review letter was received on May 25, 2021, and identified two areas of deficiency (see Attachment 2 to this report). In response to the informal discussions, and the outstanding items that were articulated in the May 25, 2021, review letter, City staff and their consultant team made additional revisions to the draft 2021-2029 Housing Element. (The May 25, 2021, HCD letter indicated that the draft proposed Housing Element would meet the statutory requirements of State Housing Element Law once it has been revised to comply with the items identified in the letter.) The revised draft 2021-2029 Housing Element (dated June 17, 2021) is provided as Attachment 3 to this report, and shows all changes tracked from the March 18, 2021, version. The June 17, 2021 draft plan is also provided as a “clean copy” as Exhibit “B” to draft Planning Commission Resolution No. 2021-10. As of this writing, it is believed that the proposed draft 2021-2029 Housing Element is in substantial compliance with specified provisions of Housing Element Law, however staff has not yet received confirmation of such from HCD.

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Community Health and Services Chapter

A text amendment to the Community Health and Services Chapter of the General Plan is needed in order to incorporate certain mandated environmental justice goals, policies, and objectives into the General Plan. Environmental justice goals are achieved when everyone in the City has the same degree of protection from environmental and health hazards; a healthy environment in which to live, learn, and work; and equal access to the decision-making process. Environmental justice policies will be aimed at reducing health risks, promoting civic engagement, and prioritizing the needs of disadvantaged communities with implementable actions that achieve them.

Environmental justice goals and policies were developed primarily through the work achieved during the course of developing the 2021 Climate Action Plan, by identifying disadvantaged communities and demographics and conducting community outreach to better understand the unique and disproportionate challenges faced by these communities. Portions of Government Code section 65302(h) that relate to civic engagement are addressed in the proposed text amendment to the Community Health and Services Chapter of the General Plan. Reliance on the 2021 Climate Action Plan will guide the City's efforts to address issues related to public health, social equity, and environmental justice. (Note that other portions of Government Code section 65302(h) will be incorporated into the Community Protection Chapter of the General Plan as part of the future amendment to that chapter noted above.)

General Plan Conformance

Government Code section 65300.5 states: "In construing the provisions of this article, the [California] Legislature intends that the General Plan and elements and parts thereof comprise an integrated, internally consistent and compatible statement of policies for the adopting agency." The purpose of requiring internal consistency is to avoid policy conflict and provide a clear policy guide for the future maintenance, improvement and development of housing within the City. The 2012 Escondido General Plan contains the following nine Chapters: 1) Vision and Purpose; 2) Land Use and Community Form; 3) Mobility and Infrastructure; 4) Housing; 5) Community Health and Services; 6) Community Protection; 7) Resource Conservation; 8) Growth Management; and 9) Economic Prosperity. All elements of the General Plan have been reviewed for consistency in coordination with this update to the Housing Element and amendment to the Community Health and Services Chapter.

1. Housing Element

The proposed draft 2021-2029 Housing Element includes three goal statements. Under each goal statement, the plan sets out policies that amplify the goal statement. Implementation programs are listed at the end of the corresponding policy or group of policies and describe briefly the proposed action, the City agencies or departments with primary responsibility for carrying out the program, and the time frame for accomplishing the program. Several of the implementation programs also list quantified objectives. Specific goals and policies related to housing are intended to guide development to meet present and future needs, achieve a vibrant community, and enhance the character of Escondido. Future land development applications are required to be consistent with all relevant policies and programs of the other elements of the General Plan.

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The Housing Element Update is a part of and is required to be consistent with the General Plan, including its growth management policies, infrastructure policies, public safety policies, health and transportation elements, and all other relevant portions of the other elements. The goals, policies, and programs described in the proposed draft 2021-2029 Housing Element are consistent with and promote the goals and policies of the overall General Plan. Only modest changes to policy directions and strategies of the 2013-2021 Housing Element are included in the Project. The main changes are that funding programs will prioritize housing, accessory dwelling units will be the focus of efforts to reduce regulatory constraints, more collaborative efforts will be pursued, the housing needs of farmworkers and the homeless will get increased attention, and other changes necessary to be consistent with recent Housing Element Law changes. Aside from these modifications, the existing housing strategies and policies are deemed adequate, and they provide a broad and comprehensive framework to guide planning and decision-making related to housing issues. Because the 2013-2021 Housing Element for the 5th Cycle planning period was utilized as a baseline, the proposed changes of the plan build upon and revise, as appropriate, the goals, policies, and programs of the existing plan to ensure that the City can meet the housing needs of all Escondido residents through 2029, when the plan is scheduled to be updated again.

The City monitors the General Plan on an annual basis to ensure consistency between the various General Plan elements and ensure policy direction introduced in one element is reflected in other plan elements. For example, residential development capacities established in the Land Use Element (Land Use and Community Form Chapter) and constraints to development identified in the Public Safety Element (Community Protection Chapter) are incorporated into the Housing Element, and the discussion of infrastructure and public services in the Housing Element is based upon information from the Mobility and Infrastructure Element and Community Protection Element. As the General Plan is amended from time to time, the City will review the Housing Element for internal consistency, and make any necessary revisions.

2. Environmental Justice Goals, Policies, and Programs

Cities' general plans must be updated to address environmental justice upon the concurrent amendment of two or more existing general plan elements. Pursuant to Government Code section 65302(h)(2), cities may either adopt an Environmental Justice Element or incorporate related environmental justice goals, policies, and objectives into other elements of their general plans. Escondido will address environmental justice through integration of goals, policies, and objectives into the Community Protection Chapter and Community Health and Services Chapter of its General Plan.

As part of its effort to address environmental justice goals, policies, and objectives, Civic Engagement goals in the Community Health and Services Chapter of the General Plan are being amended to include additional policies to expand outreach efforts to disadvantaged communities and target populations, particularly on issues that relate to social equity and health. Increased civic engagement provides a diverse perspective to inform future city policy

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and thus relates to all elements of the General Plan. Increased civic engagement in and of itself is therefore consistent with all other elements of the General Plan.

Additional General Plan text amendments related to environmental justice are being developed for incorporation into the Community Protection Chapter in the near future. A full analysis of those amendments will be provided when they are brought forth to the Planning Commission for a recommendation to the City Council.

Zoning and Specific Plan Consistency

The relationship of a Housing Element and its implementation program, as well as the authority to defer these implementing actions, is described by Government Code sections 65583(b) and (c). Under Housing Element Law, each jurisdiction must identify specific programs in its Housing Element that will allow it to implement the stated goals and policies and achieve the stated objectives. Programs must include specific action steps the locality will take to implement its policies and achieve its goals and objectives. Programs must also include a specific timeframe for implementation, identify the agencies or officials responsible for implementation, describe the jurisdiction's specific role in implementation, and (whenever possible) identify specific, measurable outcomes. This includes potential amendments to a jurisdiction's ordinances, including zoning codes and specific plans if related to the results and analyses of local housing needs, available land and financial resources, and the mitigation of identified governmental and non-governmental constraints. Housing Element goals, policies, and programs identify various zoning and specific plan standards and guidelines that should be investigated to assist in removing perceived constraints to housing production.

Climate Action Plan Consistency

The City is able to meet its RHNA requirement without any changes to General Plan designations or the densities allowed pursuant to said designations. Therefore, the proposed draft 2021-2029 Housing Element is consistent with the business-as-usual forecast of greenhouse gas emissions in future years and the General Plan amendment would not, in and of itself, result in impacts to air quality or greenhouse gas emissions. All future land use development, regardless of the status or adoption date of the proposed draft 2021-2029 Housing Element, would require project-specific environmental evaluation in order to determine that any potential impacts are less than significant, including adherence to the City's Climate Action Plan Consistency Checklist. At such time that a development proposal is considered, that project would be subject to adopted development guidelines/standards and any impacts identified with the development project would be addressed, specific to the impact.

E. FISCAL ANALYSIS:

The cost associated with the preparation of the report is included within the Community Development Department budget. HCD has supported the Housing Element Update planning effort by awarding the City \$310,000 through an SB 2 Planning Grant, and \$500,000 through a Local Early Action Planning ("LEAP") Grant Program.

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Housing Element Law recognizes that a jurisdiction's housing policies and programs may set a course of implementation actions that may exceed available resources and the community's ability to satisfy these needs. The quantified objectives of the proposed draft 2021-2029 Housing Element, therefore, need not be identical to the identified housing need but rather establishes the maximum number of housing units that can be constructed, rehabilitated, and conserved over an eight-year time frame. Future funding needs for Housing Element implementation will be brought forward to City Council for consideration as separate action item(s) and incorporated into the budgeting process. Direct budget implications in future years could also include staff resources and other direct expenses.

Several federal, state, and regional funding programs consider Housing Element compliance as an eligibility or ranking criteria. For example, the California Department of Transportation Sustainability Communities Grant; the Strategic Growth Council and HCD's Affordable Housing and Sustainable Communities Programs; and HCD's Permanent Local Housing Allocation consider Housing Element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant Housing Element, the City will meet the Housing Element requirements for these and other funding sources.

F. ENVIRONMENTAL STATUS:

The 2012 General Plan Update, Downtown Specific Plan Update and Climate Action Plan Program EIR ("Final EIR") was certified on May 23, 2012, by the Escondido City Council (SCH #2010071064). Pursuant to CEQA, when taking subsequent discretionary actions in furtherance of a project for which an EIR has been certified, the lead agency is required to review any changed circumstances or new information to determine whether any of the circumstances under Public Resources Code section 21166 and CEQA Guidelines section 15162 require additional environmental review. City staff evaluated the Project, and all aspects of the changes, in light of the standards for subsequent environmental review outlined in Public Resources Code section 21166 and CEQA Guidelines section 15162. City staff concluded that the EIR fully analyzed and mitigated, where feasible, all potentially significant environmental impacts, if any, that would result from the revised Project, and therefore, no subsequent EIR or mitigated negative declaration is required. On that basis, City staff has prepared an Addendum for the changes, pursuant to CEQA Guidelines section 15164. (The Addendum is provided as Exhibit "D" to draft Planning Commission Resolution No. 2021-10.)

The First Addendum to the Final EIR was prepared for the Downtown Specific Plan Density Transfer Program, and was adopted by City Council Ordinance No. 2019-06 on May 8, 2019. The Second Addendum to the Final EIR was prepared earlier this year to provide updated information to the previously-certified Final EIR. It was prepared in support of a proposed amendment to the Downtown Specific Plan which would modify locations where ground floor commercial uses are required, and establish new development standards for ground floor residential uses. Although the City Council has yet to independently review and consider the Second Addendum, the Planning Commission recommended approval of the Second Addendum through the approval of Resolution No. 2021-07 on June 22, 2021. It is anticipated that the

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Second Addendum and associated Downtown Specific Plan amendment will be presented to the City Council for consideration on August 11, 2021.

This Third Addendum is associated with the Project, which would repeal in its entirety the 2013-2021 Housing Element and adopt in full new text, graphics, and figures comprising the 2021-2029 Housing Element to the General Plan. The Housing Element is a policy document and its adoption would not, in itself, produce environmental impacts. It consists of a housing program; no actual development or land use designation changes are proposed as part of the Project. The population and economic growth assumptions under the proposed draft 2021-2029 Housing Element are the same as the Housing Element portion of the 2012 Escondido General Plan. The Project accommodates growth, rather than inducing it. All future land use development projects would be required to adhere to relevant development standards and design guidelines contained in the City's zoning ordinance or specific plan to quality of development at each housing site, and would be reviewed for compliance with CEQA at that time.

The Addendum is appropriate pursuant to CEQA Guidelines section 15164 because only minor changes and additions to the Final EIR are necessary to address the Project changes and no circumstances exist calling for the preparation of a subsequent or supplemental EIR pursuant to CEQA Guidelines sections 15162 and 15163. The proposed Addendum concluded that there are no substantial changes to the circumstances under which the proposed Specific Plan amendment is undertaken that would require major revisions to the Final EIR. There is no new information of substantial importance which was not known or could not have been known at the time the Final EIR was certified that shows the proposed General Plan amendment would have significant effects not discussed previously; a substantial increase in severity of a previously identified significant impact; mitigation measures or alternatives previously found infeasible that would now be feasible and would substantially reduce one or more significant effects; or mitigation measures or alternatives which are considerably different from those analyzed in the Final EIR which would substantially reduce one or more significant effects on the environment. The General Plan amendment would not result in new or more severe impacts beyond those addressed in the Final EIR, and would not meet any other standards requiring further environmental review under State CEQA Guidelines Sections 15162 and 15163. No further analysis is required.

G. PUBLIC INPUT:

Section 65583(c)(5) of the Government Code states, "The local government shall make diligent effort to achieve public participation of all the economic segments of the community in the development of the housing element, and the program shall describe this effort." The City undertook a public involvement process to help engage residents, businesses, and other community members in the development of three different housing studies and plans, consolidated under a single work program, called the Housing and Community Investment Study ("HCIS"). On June 10, 2020, the City Council considered and endorsed a Public Participation Plan ("Outreach Plan") and associated timeline to involve the community. Among other things, the work plan and schedule proposes a series of meetings with the Planning Commission to discuss different aspects and components related to the HCIS. The Outreach Plan can be accessed through the link provided below:

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https://www.escondido.org/Data/Sites/1/media/PDFs/Planning/EastValleySpecificPlan2020/HCI_SPPPJune102020.pdf

The City has also developed a periodic review page that can be accessed online at the link below to help the public access key documents. Informational reports and data generated during the review will be available for the public to view online:

<https://www.escondido.org/hcis.aspx>.

Public participation played an important role in the formulation and refinement of the City's housing goals and policies and in the development of the Housing Element. City residents had several opportunities to recommend strategies, review, and comment on the proposed draft 2021-2029 Housing Element. During the first and second phase of outreach, as part of the HCIS, which includes the development of an updated Housing Element, Sector Feasibility Study (Attachment 4 to this report), and an East Valley Specific Plan (currently being developed), the City worked with development experts, community-based interest groups, stakeholders, and the community at-large. When a draft of the Housing Element was available for review and comment, in summer 2021, public meetings to review the draft goals, policies, and programs were conducted in-person and virtually. Following review by HCD, the July 27, 2021, public hearing was scheduled with the Planning Commission to review and consider the 2021-2029 Housing Element.

The new Community Health and Services Chapter programs and policies are drawn from the 2021 Climate Action Plan, which itself underwent an extensive public review process. That two-year process included extensive public involvement, input from the Environmental Community Advisory Group, and adaptation steering committees, along with Planning Commission and City Council hearings. The reliance and reference to that document, and inferred policy guidance, helps associate additional and valued outreach and engagement activities.

Meeting notices for the July 27, 2021, Public Hearing were posted on the City's website, sent through Constant Contact (e-blast), and notification was published in the local newspaper in advance of the meeting. Copies of the draft plan were made available for review at City Hall and were posted on the City website, and notices were sent directly to agencies that serve the City's special needs populations. These service providers included organizations that represent the housing interest groups.

Public comments received on the Housing Element Update are included as Attachment 5 to this report.

H. CONCLUSION AND RECOMMENDATION:

California Government Code section 65103 requires the Planning Commission, as the City's Planning Agency, to review the proposed draft 2021-2029 Housing Element and make recommendations to the City Council as to action concerning the Housing Element Update. City staff recommends that the Planning Commission recommend approval of Planning Case No. PHG

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20-0030 based upon the factors/findings and conditions contained in Exhibit "A" to draft Planning Commission Resolution No. 2021-10. The City Council will then conduct a public hearing and take action on the Final 2021-2029 Housing Element update and General Plan amendment. Once adopted, the 2021-2029 Housing Element and General Plan amendment will have a binding effect on the City. Other planning actions such as adoption of a specific plan or zoning ordinance, approval of a subdivision map, etc. must be consistent with the General Plan, including the updated Housing Element.

Each year, jurisdictions must report to HCD on the progress made by the community in implementing the programs of the Housing Element; and to the Office of Planning and Research, the progress with General Plan implementation. These reports are critical to monitoring compliance with Housing Element Law or other program commitments during the eight-year planning cycles. Once adopted, the Planning Commission will receive this yearly reports and help the City administer a review of its progress towards meeting its obligations over the term of the planning period.

ATTACHMENTS:

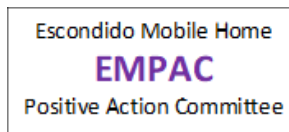
1. Superseded Draft 2021-2029 Housing Element (dated March 18, 2021)
2. Comment Letter from HCD
3. Revised Draft 2021-2029 Housing Element with strikeout/underline changes (dated June 17, 2021)
4. Sector Feasibility Study
5. Public Comments
6. Draft Planning Commission Resolution No. 2021-10 with Exhibits "A" through "D"

**JULY 27, 2021, PLANNING COMMISSION STAFF REPORT
ATTACHMENTS**

Attachments to the July 27, 2021, Planning Commission staff report are provided on pages 92 – 169 at the following link:

<https://www.escondido.org/Data/Sites/1/media/PDFs/Planning/HCIS/PublicReviewDraftEscondidoHE3-18-21.pdf>

A hardcopy of the Planning Commission staff report attachments is available for review in the Office of the Planning Division during normal business hours (8 a.m. to 5 p.m.).



Escondido Community Housing Coalition

July 26, 2021

Mayor and City Council
Planning Commissioners
City of Escondido

Via Email – Corrected version sent July 30, 2021

RE: Escondido Community Housing Coalition Recommendations for Amendments to Escondido Revised Draft Housing Element

Dear Mayor and City Council and Planning Commissioners:

The Escondido Community Housing Coalition (EHC) is composed of social and environmental justice organizations within San Diego County that have united in advocating for the creation of inclusive, thriving communities, where every resident in the City of Escondido has access to affordable, safe, housing near job and transit centers.

We urge the Planning Commission and City Council to make the following revisions to the Draft Revised Escondido Housing Element (HE):

1. Create an Escondido Housing Commission.

Escondido has not had a Housing Commission for over 10 years. However, it is clear that such a commission is now timely and could be helpful to further housing goals in our city. We recommend that the EHE re-establish an Escondido Housing Commission. There seem to be many programs dispersed throughout the city that can be unified under a centralized Housing Commission. The Housing Commission in Oceanside is a successful model of community involvement and oversight of a city's housing programs and initiatives. The mandatory public involvement requirement for the housing element could be achieved through a commitment to a Housing Commission. Housing is an important issue, especially now as the California Eviction Moratorium ends on September 30, 2021. Escondido needs to establish an advisory Housing Commission.

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2. Require development of an Inclusionary Housing Ordinance for Escondido.

Ten of the 18 cities in San Diego County already have inclusionary housing ordinances (IHO). The County has directed its staff to create an IHO for the unincorporated area. The incentives-only strategy has thus far failed to serve the residents of Escondido with the affordable housing that is needed. We request that the Council direct staff to investigate and propose an IHO for Escondido with an ultimate goal of 25%, on-site, deed restricted, affordable housing requirement for nearly all new housing projects. If in-lieu fees are to be attached to a future IHO, we request that they be significant enough to result in actual affordable housing project construction. We recommend that Escondido require developers to pay an in-lieu fee of \$25/sf such as is required by the City of San Diego. Last, other cities also include an in-lieu fee for projects between 2-10 units. This would be another aspect to include in the analysis.

3. Create a two-tiered approach to inclusionary housing.

As part of an IHO, we recommend the city establish a two-tiered inclusionary program. The first tier based on the existing zoning framework and the second associated with city actions that increase land values, such as plan updates, density bonuses, specific plans, and up-zonings. Those public actions can significantly increase land values and it is only fair and inclusive policy to recapture some of those increases for public benefit through higher inclusionary requirements.

4. Remove proposed housing locations within 500 feet of a freeway or routes heavily trafficked by diesel trucks.

Housing development within 500 feet of a major freeway or heavily trafficked road is extremely 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. Any targeted location for affordable housing development under the RHNA delegation should be removed and relocated to a more healthful location.

5. Remove proposed housing from locations in Very High Fire Severity Zones and concentrate in area served by transit and other existing infrastructure.

Sprawl development in high-VMT and high fire hazard areas is one of our region's greatest sources of air emissions. Development in these areas threatens the health of all residents, especially those unable to protect themselves during fires. Directing infrastructure and maintenance resources away from the city core to support sprawl is an injustice and does represent equitable development. Further, it does not comport with the city's General Plan commitment to sustainable development. The EHE should prohibit development of housing in hazardous fire areas far from existing infrastructure and should focus resources, time, and attention on funding and improving Escondido's urban core

6. Urban Greening should be an integral part of improving housing in Escondido.

The recent heat waves are a direct threat to the health and well-being of residents in Escondido. Adequate tree canopies are known to lower heat in impacted areas as much as 10 degrees. The Priority Investment Neighborhoods designated in the Climate Action Plan should receive early planning and funding for increased tree canopy, parks, and green spaces where they are supported by the residents. Further, studies have shown that access to green spaces is

ATTACHMENT "2"

important for children and healthy families. We recommend that the EHE specifically commit to early focus on tree canopy and other green infrastructure improvement as described in the Escondido Climate Action Plan noted below.

“Develop an urban heat island reduction program that includes an urban forest program or plan for priority investment neighborhoods (“PINs”) that achieves a tree planting coverage of at least 35 percent. Expand and focus tree plantings in low canopy neighborhoods and neighborhoods at a higher risk of adverse outcomes of urban heat island effects and to encourage urban agriculture through edible landscapes within some publicly accessible areas.” (ECAP at 3-23)

7. EHE should include actions to specifically ensure Rent Forgiveness programs are accessed by residents and a Tenant Protection Ordinance and Rent Registry System should be adopted.

We recommend the EHE commit the city to create a Tenant Protection Board which would be responsible for providing legal, mediation, and arbitration services to tenants in Escondido to protect them from illegal evictions and homelessness. In addition, a Rent Registry System should be created where landlords can register their units with the city.

8. New Home buying programs should set higher performance goals and be expanded to include city-initiated/supported community land trusts.

Facilitating home ownership by low-income residents is an important means to create wealth that can lift people out of poverty. The current EHE stated goal for the First-Time Homebuyer Assistance proposed is to assist one family a year, which is extremely insufficient. We request that this target be set higher for this important effort. A proven program nationwide that can offer opportunities for ownership/wealth creation for low-income families is through Community Land Trusts (CLTs). We request that the EHE commit to collaborating with CLTs and developing programs for affordable housing development.

The member organizations of the Escondido Community Housing Coalition are committed to working with you and your staff to achieve housing goals for the city. Our coalition will continue to reach out to other organizations with an interest and expertise in housing. We understand that these issues are complex and need discussion and analysis and we look forward to an on-going process. We appreciate your consideration of these recommendations.

Sincerely,

Natasha Howell, Chair Housing Committee
Rob Jenkins, First Vice-President
North San Diego County NAACP

Yusef Miller, Director
North County Equity and Justice Coalition

Estela De Los Rios, Executive Director
CSA San Diego Fair Housing

Madison Coleman, Policy Advocate
Climate Action Campaign

Laura Hunter, Chair Conservation Committee
Sierra Club North County Group

Evelyn Langston, President
Escondido Mobile Home Positive Action Committee (EMPAC)

ATTACHMENT "2"

CC.

Sean McGlynn, City Manager

Karen Youel, Housing and Neighborhood Services Manager

**Public Comments
PHG 20-0030**

July 7, 2021

Ms. Kristina Owens
Associate Planner
City of Escondido
201 North Broadway
Escondido, CA 92025
Submitted via email: kowens@escondido.org

Re: Draft 6th Cycle Housing Element

Dear Ms. Owens:

On behalf of the San Diego Housing Federation, we are writing to provide comments and feedback on the draft 6th Cycle Housing Element for the City of Escondido.

The draft Housing Element contains several actionable items that will help Escondido make progress toward meeting its housing goals. We applaud these components of the draft Housing Element and would like to make some additional recommendations to strengthen the plan's impact on achieving housing goals.

Implementing State Legislation

The San Diego Housing Federation was a proud co-sponsor of AB 1486, a bill that strengthened and clarified the state's Surplus Land Act. City implementation of this bill will help the city make progress toward the need for 3,113 low- and very-low income units for the Regional Housing Needs Allocation for the 2021-2029 cycle (p. 84). Identifying unused City-owned sites for housing can help to ensure the City is compliant with the State Surplus Land Act and helps support the development of affordable housing. We encourage Program 1.4 regarding City-owned land (p. 114) to include a provision to update city policies to comply with the Surplus Land Act.

We are pleased to see Program 1.6 to amend the City's zoning ordinance to comply with state law (p. 115). We recommend that the City move quickly to implement AB 1763, a bill we supported which provides a density bonus for developments that are 100 percent affordable, to serve as a tool for building affordable housing. The City should also work to implement AB 2345, a bill we supported that builds on the success of the City of San Diego's Affordable Homes Bonus Program (AHBP) by taking the program statewide. A report by Circulate San Diego, "[Equity and Climate for Homes](#)," found that 63 percent of AHBP projects were located in high and highest resource census tracts, demonstrating the program's role in affirmatively furthering fair housing.

ATTACHMENT "2"

Local funding for affordable housing

The draft Housing Element recognizes the need for funding to build housing that is affordable to low-income individuals and families and that federal and state funding is a critical piece to the resources puzzle. We strongly support Program 2.7 to pursue funding sources for the construction, acquisition and rehabilitation, and preservation of affordable housing (p. 119). We recommend that the Housing Element specifically include a goal to prioritize funds made available through the Permanent Local Housing Allocation (PLHA), also known as the Building Homes and Jobs Act ([SB 2, 2017](#)), for the development of deed-restricted affordable housing. Maximizing the use of these funds to build housing for extremely low-, very low-, and moderate income households will help the City meet its RHNA obligations. As local gap financing is critical, we also strongly support the City including recycled RDA funds as a local financing source.

Affirmatively furthering fair housing and equity

As noted in the housing element, there are two areas of poverty and racial concentration in Escondido (p. 99). As we know, housing development policies – how much and where new housing can be built – play a role in patterns of segregation within a community.

While Housing Policy 1.1 to expand the stock of all housing (p. 116) is laudable, the constraints created by the City's Proposition S, which requires voter approval of specified future changes to the Escondido General Plan, can hinder the goals of those policies and can play a role in creating exclusion. We recommend that Program 1.7, Monitoring of Growth Management Measure (p. 115) be updated to fully examine the impact of Proposition S on housing production and fair housing goals.

We further recommend that the City work with HCD on AFFH recommendations as they relate specifically to Housing Elements and incorporate those recommendations in the plan.

Housing and Climate Change

Our September 2016 report, "[Location Matters: Affordable Housing and VMT Reduction in San Diego County](#)," found that lower-income households are more likely to live in transit-rich areas, own fewer cars, are likely to live in larger building and smaller units, all factors that make affordable housing near transit a key greenhouse gas reduction strategy. The City's Climate Action Plan calls for pursuing state grants such as the Affordable Housing and Sustainable Communities (AHSC) Grant to support affordable housing near transit (Climate Action Plan, March 2021, p. 3-14). However, the mentions of addressing climate change in the Housing Element are in relation to climate resilient homes and make no mention of dense, deed-restricted affordable housing as a greenhouse gas reduction tool nor pursuing AHSC funds. We urge the City to examine the role of affordable housing in helping the City to meet both its RHNA obligations and its Climate Action Plan goals.

ATTACHMENT "2"

We thank you for consideration of our feedback and comments. We appreciate the time and effort that staff have dedicated to the draft Housing Element document and look forward to supporting Escondido in adopting a robust plan that will help to meet the City's housing goals.

Sincerely,



Laura Nunn
Chief of Policy & Education

MEMORANDUM

TO: Members of the Escondido City Council and Escondido Planning Commission

FROM: Erik Felix and Lauren Harper

DATE: 06/11/2021

SUBJECT: Recommendations for Escondido's 6th Cycle Housing Element

Dear members of the Escondido City Council and Planning Commission,

Upon reviewing your 6th Cycle Housing Element, we would like to share some thoughts and observations that we feel are critical to consider to meet the housing needs of Escondido residents. The city has experienced a demographic shift over the past ten years, with a growing Hispanic population and decreasing white population. Escondido's total Regional Housing Needs Allocation (RHNA) is 230% more than the previous cycle. Despite these demographic changes and large expectations, Escondido's Housing Element is riddled with vague and aspirational language and estimates that go against the standards set forth by the California Department of Housing and Community Development (HCD).¹ As urban planning graduate students, we find it imperative that the state grow in an equitable and inclusive manner. Escondido's growing Hispanic and low-income population gives the City Council and Planning Commission an integral role in achieving that goal. We've organized our comments under the following topics: updating programs for Escondido's growing low-income population, improving siting and tenant protections to Affirmatively Further Fair Housing (AFFH), mitigating development fee burdens, invalidating Proposition S, and designing a mid-cycle Accessory Dwelling Unit (ADU) development trigger.

Updating programs for Escondido's growing low-income population

Escondido's growing population of cost-burdened and low-income households is a signal to the City Council and Planning Commission that it must proactively address its stagnant housing production. Between 2010-2020, population growth increased 6.3%, yet housing units only grew 2.4%. This difference partly explains the growing rent burden your residents are experiencing. When compared to other jurisdictions in North San Diego, Escondido reported the most cost burdened residents, with 44.8% of all households paying more than 30% of their income on housing. Cost-burdened

¹ "Affirmatively Furthering Fair Housing - California Department of ..." 27 Apr. 2021, https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf. Accessed 26 May. 2021.

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households are forced to spend less on basic necessities like healthcare and food.² Not actively meeting the housing needs of your residents will place them in increasing precarity. This is extremely important considering Escondido has a majority low-income community (53%) and the lowest median household income in North San Diego. Escondido has identified sites for a total capacity of 8,109 low-income units. Yet, Escondido's quantified objectives only plan to meet 45% of their low-income RHNA goal.³ This is unacceptable. Worse, it appears that even this unaspiring estimation is inflated. Sixteen of your 21 programs from last cycle were not met and carried over into this housing element, and you have fewer programs this cycle, 18. Your last cycle yielded approximately 11% of its low-income RHNA goal, or 200 units.⁴ For your 6th cycle, you estimate 795 low-income units will be built. How do you expect to build almost four times more low-income housing with essentially the same programs? Escondido should reconsider the design of its programs and incorporate mid-cycle triggers that facilitate by-right, multifamily development to house its growing cost-burdened and low-income residents.

Improving siting and tenant protections to Affirmatively Further Fair Housing

AB 686 requires that housing elements include affirmatively furthering fair housing (AFFH) as part of their planning process. The goal of AFFH is to “combat housing discrimination, eliminate racial bias, undo historic patterns of segregation, and lift barriers that restrict access in order to foster inclusive communities and achieve racial equity, fair housing choice, and opportunity for all Californians⁵.” More specifically, this includes a spatial analysis to ensure that low-income units are distributed across neighborhoods of all income levels, as well as ensuring investment in low-income neighborhoods.

We conducted an AFFH site score analysis to calculate the spatial distribution of low-income RHNA units by block group median household income. This analysis results in a value from 1 to -1, where 1 is perfectly distributed and -1 is perfectly segregated. Escondido scored a -0.69, indicating that a majority of low-income units are sited in low-income areas. The goal of AFFH is to break-up areas of concentrated poverty and affluence by siting low-income housing in higher income neighborhoods.

The Housing Element addresses this shortcoming, noting “many RHNA units are located in lower resource census tracts. However, through specific planning, the City is

² National Low Income Housing Coalition. 2020. *The Gap: A Shortage of Affordable Homes*. National Low Income Housing Coalition. https://reports.nlihc.org/sites/default/files/gap/Gap-Report_2020.pdf

³ City of Escondido 6th Cycle Housing Element - Draft.” Page 123. March 2021. <https://www.escondido.org/Data/Sites/1/media/PDFs/Planning/HGIS/PublicReviewDraftEscondidoHE3-18-21.pdf> Accessed 28 May. 2021.

⁴ "5TH CYCLE REGIONAL HOUSING NEEDS ... - SANDAG." https://www.sandag.org/uploads/publicationid/publicationid_4647_27206.pdf. Accessed 27 May. 2021.

⁵ “Affirmatively Furthering Fair Housing in California.” California Department of Housing and Community Development. <https://www.hcd.ca.gov/community-development/affh/index.shtml> Accessed 28 May. 2021.

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actively pursuing improvements on neighborhoods with low resources⁶.” Indeed, the Downtown, East Valley, and South Centre City Parkway Specific plans do indicate future investment in neighborhood infrastructure in those areas. However, if greater investment makes these neighborhoods more attractive areas to live, how will the City ensure that low-income units are built and remain affordable? The Housing Element does not provide specific funding or incentive plans to develop low-income housing in these areas, beyond high-density zoning.

Additionally, the AFFH site score analysis may be skewed due to how the site inventory categorizes sites by income. A table titled “Summary of RHNA Status” shows how the City anticipates meeting the RHNA goals based on the site inventory⁷. However, the City lumps nearly all identified sites into the “very low” income category due to zoning density greater than 30 du/acre. This leaves other income categories well below the RHNA requirement. The City recognizes this shortfall and argues that “excess capacity on lower income sites can accommodate the remaining balance⁸”. Because this designation is based only on zoning density and not other programs directly incentivizing housing at certain income-levels, there is functionally no plan to ensure housing will be produced at lower income levels, and will likely skew toward above moderate market rate development. Escondido must design tenant protections and land use policies that will facilitate the development of affordable housing and maintain its accessibility for low-income households.

Site Category	Above Moderate	Moderate	Low	Very Low	Total
RHNA	4,967	1,527	1,249	1,864	9,607
Units on Identified Sites	1,005	388	0	7,268	8,661
Approved and Under Construction Projects	1,357	0	245	0	1,602
Projects Undergoing Entitlement	649	0	371	0	1,020
Accessory Dwelling Units	153	262	99	126	640
Total Identified Capacity	3,164	650	715	7,394	11,923

Source: Draft City of Escondido 6th Cycle Housing Element 2021-2029

In a further blow to AFFH goals, the housing element states that “the City retains certain amount of large-lot zoning to accommodate the housing needs and preferences of moderate and higher income households⁷”. Reserving large lots for high-income households while anticipating low-income development in low-resourced neighborhoods is antithetical to AFFH goals.

⁶ “City of Escondido 6th Cycle Housing Element - Draft.” Page 105. March 2021.
<https://www.escondido.org/Data/Sites/1/media/PDFs/Planning/HCIS/PublicReviewDraftEscondidoHE3-18-21.pdf> Accessed 28 May. 2021.

⁷ City of Escondido 6th Cycle Housing Element - Draft.” Table 56. March 2021.
<https://www.escondido.org/Data/Sites/1/media/PDFs/Planning/HCIS/PublicReviewDraftEscondidoHE3-18-21.pdf> Accessed 28 May. 2021.

⁸ City of Escondido 6th Cycle Housing Element - Draft.” Page 97. March 2021.
<https://www.escondido.org/Data/Sites/1/media/PDFs/Planning/HCIS/PublicReviewDraftEscondidoHE3-18-21.pdf> Accessed 28 May. 2021.

Mitigating development fee burdens

The Escondido Housing Element correctly recognizes that development fees can be a barrier to building housing, but its portrayal of its development fees being low to moderately priced compared to the region is misleading. The Housing Element compares Escondido to coastal cities in North San Diego like Carlsbad and Oceanside. Relative to these cities, Escondido generally has lower fees and total per unit costs. But these cities are twenty miles away from Escondido. Between them is San Marcos, a jurisdiction that is directly adjacent to Escondido. When compared to its direct neighbor, Escondido's planning fees are 33% to 400% higher than San Marcos.⁹ Escondido's per unit permit and impact fees are also higher than San Marcos and another nearby city, Vista. For all four housing types – from single family homes to apartments - Escondido's total fees were \$5,500 - \$15,170 more expensive than San Marcos and Vista. Yet, Escondido claims that "these fees have not been found to act as a constraint" to development¹⁰. This appears to be false. When excluding above moderate housing, your last cycle yielded approximately 7% of its remaining RHNA goals.¹¹ Multi-family developments require grading exemptions (for grading exceeding requirements), precise development plans and variances. None of their costs are given in the Housing Element. Escondido should evaluate these and all their development and impact fees to ensure they are not deterring developers from contributing to its lower income housing stock.

Invalidating Proposition S

Escondido's Proposition S is a potential barrier to development, but the City does not actually have to abide by it. Proposition S is an ordinance passed in 1998 that requires voter approval for changes made to the General Plan that alters or increases residential density and land use categories. To Escondido's credit, the Housing Element includes a program to monitor the effects Proposition S has on reaching the City's RHNA goals and will explore potential mitigation measures, if needed. But the City does not have to abide by Proposition S. According to SB-330, growth management ordinances, like Proposition S, are only valid if the county where the city is located consists of more than 550,000 acres of agricultural land or is at least one-half agricultural land.¹² San Diego

⁹ "Draft Housing Element — San Marcos General Plan Update." 12 Mar. 2021, <https://sanmarcos.generalplan.org/draft-housing-element>. Accessed 27 May. 2021.

¹⁰ City of Escondido 6th Cycle Housing Element - Draft." Page 72. March 2021. <https://www.escondido.org/Data/Sites/1/media/PDFs/Planning/HGIS/PublicReviewDraftEscondidoHE3-18-21.pdf> Accessed 28 May. 2021.

¹¹ "5TH CYCLE REGIONAL HOUSING NEEDS ... - SANDAG." https://www.sandag.org/uploads/publicationid/publicationid_4647_27206.pdf. Accessed 27 May. 2021.

¹² Housing Crisis Act of 2019, SB-330, Senate (California 2019). https://leginfo.ca.gov/faces/billTextClient.xhtml?bill_id=201920200SB330

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County consists of 250,000 acres of agricultural land, making it 9% agricultural.¹³ ¹⁴ Proposition S is no longer valid as a smart growth ordinance in Escondido. The city should analyze where Proposition S has been restricting development and leverage developable parcels to reach more than its stated goal of achieving 45% of its low-income RHNA.¹⁵

Designing a mid-cycle ADU development trigger

The housing element estimates that 80 ADU units per year will be constructed in the 6th cycle, for a total of 640 units.¹⁶ Based on ADU permitting data from the previous three years (25, 40, and 74 permitted), the Safe Harbour calculation provided by the Housing Element estimates 45 units per year, for a total of 365 units. The Housing Element describes 80 ADUs per year as a “conservative production rate” and anticipates a growing trend in ADUs permitted. However, substantial evidence is not provided, beyond stating “City is considering adopting other incentives to encourage and promote ADUs, including allowing ADUs on religious properties.” The City needs more concrete evidence that ADU permitting will continue to increase and significantly exceed the Safe Harbour calculation. An automatic mid-cycle trigger should be considered to address any shortfalls in production.

Additionally, the City should consider a recent study by UCLA Ziman Center for Real Estate which found that up to 20% of ADUs permitted were not used as housing.¹⁷ The City should not assume that all permitted ADUs will contribute toward housing production for the RHNA goals.

Conclusion

Over the past few years, legislation has given the state more tools to make sure each jurisdiction is doing their part in upholding the goals of AFFH through their housing elements. HCD is already reviewing housing element drafts for cities in San Diego County and, thus far, have found all of them deficient in AFFH. This cycle has already proven to be different from past cycles, and we encourage you to consider our recommendations to design a housing element that will guide Escondido in providing housing security to its residents.

¹³ "San Diego Agriculture – The San Diego County Farm Bureau." <https://www.sdfarmbureau.org/san-diego-agriculture/>. Accessed 26 May. 2021.

¹⁴ "U.S. Census Bureau QuickFacts: San Diego County, California" <https://www.census.gov/quickfacts/fact/table/sandiegocountycalifornia,CA/PST045219>. Accessed 26 May. 2021.

¹⁵ City of Escondido 6th Cycle Housing Element - Draft." Page 123. March 2021. <https://www.escondido.org/Data/Sites/1/media/PDFs/Planning/HGIS/PublicReviewDraftEscondidoHE3-18-21.pdf> Accessed 28 May. 2021.

¹⁶ City of Escondido 6th Cycle Housing Element - Draft." Page 95. March 2021. <https://www.escondido.org/Data/Sites/1/media/PDFs/Planning/HGIS/PublicReviewDraftEscondidoHE3-18-21.pdf> Accessed 28 May. 2021.

¹⁷ "How are ADUs Used? The Impact of Accessory Dwelling Units in Los Angeles." May 2021. https://www.anderson.ucla.edu/documents/areas/ctr/ziman/2021/UCLA_Economic_Letter_Crane_052521_v3.pdf

ATTACHMENT "2"

From: [Scott Graves](#)
To: [Zachary Beck](#); [Mike Strong](#)
Subject: [EXT] Today's Housing Element Comment
Date: Wednesday, March 24, 2021 6:14:53 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender email address AND know the content is safe.

Greetings Zack,

My public comment that I submitted through the website was not read aloud on the live feed. Here is my comment.

Greetings Mayor and City Council Members.

My comments are in reference to page 81, Environmental and Infrastructure Constraints section.

Pages 81-83 goes into detail regarding the following environmental and infrastructure constraints to the feasibility and cost of developing housing: soil, steep slopes, seismic safety, flood hazards, hazardous materials, ridgeline and hillside conservation, water supply, and wastewater capacity.

The document has separate paragraphs addressing each one of these issues except wildfire. Not elaborating on wildfire and its effects on the Housing Element, and potential housing projects in the Wildlife Urban Interface (WUI) demonstrates a glaring omission. The last several years have shown the increasing frequency, widespread devastation, economic damage, and most importantly, loss of life, due to wildfire. In my opinion, failing to address whatsoever, the largest environmental and infrastructure constraint, wildfire, renders Escondido's Housing Element incomplete.

It should also be noted that on page 97,

"Ability to Meet RHNA, Based on the City's currently available residential and mixed-use sites, adequate residential capacity is available to meet the City's RHNA for all income groups."

It is not necessary to develop the high fire risk backcountry to comply with RHNA requirements.

Thanks for your time and consideration.
Escondido Resident,
Scott Graves

ATTACHMENT "2"

From: earthlover@sbcglobal.net
To: [Mike Strong](#)
Subject: [EXT] Sierra Club NCG comments on item H.1 Housing Element for tonight's meeting bcc Commissioners
Date: Tuesday, March 23, 2021 1:53:47 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender email address AND know the content is safe.

Dear Planning Commissioners,

Sierra Club NCG has been very active in this issue, but given the very short timeline we have not been able to fully review all the drafts. While we plan to engage in the public review process, **we request that the city not begin the environmental analysis or submit the draft plan to the state** until there is a longer review period on these documents and there has been at least one public workshop where the public can provide comments on the newly released drafts.

In spite of the short timeline, we would like to make the following points and request that the Planning Commission make the following recommendations to Council:

1. First, we disagree with the statement on page 5 of the staff report which states, "*The City has historically met, and plans to continue meeting, the need for low- and very low-income housing through designation of appropriately zoned land.*" This is incorrect. The City has **not met** its requirements or the real need for very-low and low income housing at all. That is why we have a significant housing problem for low-income families in Escondido.

To address this problem, the Housing Element and city policies should:

- a. Require a minimum density for development where needed especially near transportation corridors;
 - b. Adopt an inclusionary housing ordinance or other requirement which will result in construction of actual affordable housing like many other cities require;
 - c. Commit to using some of its American Rescue Plan funding to create a city sponsored Affordable Housing Fund or Land Trust in order to ensure development of housing we need; and,
 - d. Develop a multi-action Affordable Housing Program comprising of multiple commitments to address this issue.
2. We request major revision to the strategy that the city seems to be pursuing that affordable units and market rate units are, primarily, planned to be segregated into separate projects. The strategy should be revised to include a mix of housing for residents in more economic ranges to create a more inclusive community.
 3. The 90 units from the Palomar Heights listed under affordable housing in Table A-2 is incorrect. These units are not deed-restricted and, merely by the fact they are designated for 'seniors', does not mean they will house low-income residents. While many seniors live on very limited means, many others do not. The city should require

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these to be deed-restricted to stay on the list—or remove them here.

4. In assessing the environmental health impacts on Table 58 the State CalEnviroScreen should also be incorporated as a data source.
5. New housing should not be located within 500 feet of a freeway per the California Air Resources Board Land Use Guidance on locating vulnerable communities close to significant pollution sources.
6. There is a significant disconnect in policies the city plans to pursue and the RHNA status Table 56. Although the city has significant 'Identified' sites for Very Low income, there are **zero** approved, undergoing entitlement, or under construction. Further, we know that 'planned' units may fail to materialize such as occurred with the Palomar Heights decision where 1350 units were reduce to 510 –**significantly under density and including no affordable housing**. All of this demonstrates the dire need for some kind of **guaranteed** affordable housing requirement that travels with project approvals for Above Moderate units. If there had even been a very modest 10% requirement for affordable units in a project built to the density it was planned, the current total would have yielded 135 additional affordable units. What the city is currently doing to provide for affordable housing is not working. This Housing Element update is the perfect opportunity to change that.

In closing, it is worth noting that the last four Planning Commission meetings were cancelled. One or more of those meetings would have been a perfect opportunity to bring these lengthy and complicated drafts forward for more in-depth and less rushed discussion as they will have not. Something this important should not be this rushed.

Thank you for your consideration.

Laura Hunter, Chair

Sierra Club NCG Conservation Committee

ATTACHMENT "2"

From: [patricia borchmann](#)
To: [Mike Strong](#); [Adam Finestone](#)
Subject: [EXT] Re: Agenda #H1 , Escondido Planning Commission, Housing and Community Investment Study (Please Read Aloud)
Date: Tuesday, March 23, 2021 10:03:46 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender email address AND know the content is safe.

Mike Strong and Adam Finestone,

Fyi, after the Planning Commission meeting was adjourned, I looked again at the online website regarding Planning Commission information. I found the online portal system address, that I should have used, instead of the email that I sent earlier this afternoon. Even though my submittal was too late, at least I learned the proper method for submittal of public comments to the Planning Commission for future Agenda items. So no response is needed to respond to that question in my recent email.

Although it was submitted too late, I just sent my public comment for the Planning Commission on that portal for the purpose of making a personal effort to see if it could be included in the public record on Agenda item H-1. for the "Housing and Community Investment Study".

I was glad to hear Chairman Weiller request that the Sector Feasibility Study be scheduled for future consideration by the Planning Commission, once the study is completed, and that it be released online for public review. And I was encouraged to see that the requests by Commissioner Barba would be Agendized for April 13, 2021, which are also items of great interest to the public.

Thank you.

On Tue, Mar 23, 2021 at 9:18 PM patricia borchmann <pborchmann9@gmail.com> wrote:
Mike Strong and Adam Finestone -

I was disappointed that the Public Comment that I submitted earlier this afternoon (at 4:01 pm) for Planning Commission Agenda #H-1 for the Housing and Community Investment Study were not shared, or read into the public record for this item.

So I would appreciate it if you could inform me why not, or what alternative method is necessary to submit formal public comments to Planning Commission in the future ? As far as I know, the public is not expected to send emails directly to Planning Commissioners, and that Agenda-related emails from the public to the Commission are controlled by Director Mike Strong. .

If possible, even though my public comment was excluded during Planning Commission meeting tonight, please advise if it is possible to enter my email into the public record ?

For your convenience, I cut/pasted the earlier email I sent this afternoon, so it appears below.

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Thank you.

Dear Planning Commissioners,

Generally I support the intent of the **Housing and Community Investment Study**, and I previewed the Staff Report which describes HCIS plan, that will cover: 1) Housing Element Update, 2) Sector Feasibility Study, and 3) East Valley Specific Plan, however I have a personal concern that the rushed process applied to this Agenda item compromised an adequate public review process, especially for a topic of this scope, scale and importance.

I observed that the last four (4) Planning Commission meetings were canceled, but it now seems unfortunate, and unfair that there was no opportunity for earlier public exposure and comment on this important item. Now there is an overly rushed schedule for this same item which will also be considered tomorrow night by Escondido City Council, as Agenda #9 on March 24, 2021.

Some stakeholders consider it inappropriate to take up the slack by scheduling back to back public hearings on consecutive days between the Planning Commission and City Council meetings. It is not conducive to thorough public review, and I suggest it reflects a presumption that no action by the Planning Commission tonight will require adjustments, or potential changes that can possibly be reflected at Escondido City Council tomorrow night in a meaningful way. Expediency in streamlined processing is one thing, but **this** compressed schedule does not indicate that the City of Escondido values either public comment, or potential comments by the Planning Commission, that could make a difference. I cannot help thinking that it is an undeserved insult to be blunt, to both the Planning Commission, and the public. This concern is further emphasized by the fact that this Planning Commission Agenda item was only released to the public five days ago, which is too brief a period for most stakeholders to realistically have time to preview, analyze the complex Staff Report, and prepare meaningful public comment.

While more extensive time to preview Agenda material in the future is encouraged, please consider a few personal comments, based on a quick preview which was not as thorough as many would prefer : . First, make sure Inclusionary Housing is fully integrated into the Housing Plan update, without allowances for waivers or exceptions.

Next, on page 12, I observed the Staff Report indicates: *"If a local government has adopted, through regulations or ordinance, **minimum density requirements that explicitly prohibit development below the minimum density**, the Housing Element may establish the housing unit capacity based on the established minimum density"*. Since you have the authority, I urge the Planning Commission to recommend to the City Council that this specific minimum density requirement be applied to the Housing Element Update, to prohibit development below the minimum density, to avoid irrevocable land use decisions that are a mistake.

Based on the recent approval of Palomar Heights project, for only 510 dwelling units and a reduced square footage for mixed use, it was only a small fraction of the maximum allowable density, and ground floor retail space in a project that was not publicly supported, especially where there were no affordable housing dwellings proposed with deed restricted units. . Approval of that project, with exemption from Community Facilities District (CFD) was a major disappointment to many stakeholders, taxpayers and organizations with

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expertise in Affordable Housing.

Unfortunately stakeholders learned the hard way what can go wrong with careless proposals, especially for those projects that are 'in the pipeline'. As a result, public stakeholders want to take every opportunity to prepare and submit meaningful public comments whenever opportunities arise. You can be sure that many stakeholders plan to do so, to ensure a balanced mix of housing types, and affordability categories will be constructed in Escondido, to provide home-ownership opportunities to stakeholders in all income categories, for sustainable projects that will contribute to the quality of life for all.

Thank you for thoughtful consideration.

On Tue, Mar 23, 2021 at 4:01 PM patricia borchmann <pborchmann9@gmail.com> wrote:
Dear Planning Commissioners,

Generally I support the intent of the **Housing and Community Investment Study**, and I previewed the Staff Report which describes HCIS plan, that will cover: 1) Housing Element Update, 2) Sector Feasibility Study, and 3) East Valley Specific Plan, however I have a personal concern that the rushed process applied to this Agenda item compromised an adequate public review process, especially for a topic of this scope, scale and importance.

I observed that the last four (4) Planning Commission meetings were canceled, but it now seems unfortunate, and unfair that there was no opportunity for earlier public exposure and comment on this important item. Now there is an overly rushed schedule for this same item which will also be considered tomorrow night by Escondido City Council, as Agenda #9 on March 24, 2021.

Some stakeholders consider it inappropriate to take up the slack by scheduling back to back public hearings on consecutive days between the Planning Commission and City Council meetings. It is not conducive to thorough public review, and I suggest it reflects a presumption that no action by the Planning Commission tonight will require adjustments, or potential changes that can possibly be reflected at Escondido City Council tomorrow night in a meaningful way. Expediency in streamlined processing is one thing, but **this** compressed schedule does not indicate that the City of Escondido values either public comment, or potential comments by the Planning Commission, that could make a difference. I cannot help thinking that it is an undeserved insult to be blunt, to both the Planning Commission, and the public. This concern is further emphasized by the fact that this Planning Commission Agenda item was only released to the public five days ago, which is too brief a period for most stakeholders to realistically have time to preview, analyze the complex Staff Report, and prepare meaningful public comment.

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Based on the recent approval of Palomar Heights project, for only 510 dwelling units and a reduced square footage for mixed use, it was only a small fraction of the maximum allowable density, and ground floor retail space in a project that was not publicly supported, especially where there were no affordable housing dwellings proposed with deed restricted units. . Approval of that project, with exemption from Community Facilities District (CFD) was a major disappointment to many stakeholders, taxpayers and organizations with expertise in Affordable Housing.

Unfortunately stakeholders learned the hard way what can go wrong with careless proposals, especially for those projects that are 'in the pipeline'. As a result, public stakeholders want to take every opportunity to prepare and submit meaningful public comments whenever opportunities arise. You can be sure that many stakeholders plan to do so, to ensure a balanced mix of housing types, and affordability categories will be constructed in Escondido, to provide home-ownership opportunities to stakeholders in all income categories, for sustainable projects that will contribute to the quality of life for all.

Thank you for thoughtful consideration.



North County Group
Sierra Club San Diego
P.O. Box 2141
Escondido, CA 92033

March 24, 2021

Mayor McNamara and City Council
City of Escondido
Via Email

RE: Sierra Club NCG initial Comments on Draft 2021 Escondido Housing Element

Dear Mayor and City Council Members:

Sierra Club North County Group (NCG) has previously submitted extensive comments in the planning stages on both the proposed [Housing Element](#) and the [East Valley Specific Plan Update](#).

NCG plans to engage in the public review process but **we request that the city not begin the environmental analysis or submit the draft plan to the state** until you have had some (longer than a few days) review period on the Housing Element and the East Valley Specific Plan, and there has been at least one public workshop in which the Council can consider amending actions to the draft. Our experience with the Climate Action Plan is that once the draft went in for the environmental analysis it was far more difficult to make significant changes to the goals, approach, or other aspects that may be needed.

Overall comment

NCG supports the housing and development strategy outlined in the [Quality of Life Coalition letter dated November 18, 2019](#) which read, in part,

As more development projects come before you, to focus and maximize resources now and to realize a successful transit-oriented future, projects adopted by the city should meet clear objectives. Projects that the city supports should reduce (not increase) VMT; avoid high-risk fire areas; ensure safe evacuation routes for all residents; add to affordable housing stock; qualify as infill developments; contribute to the support of transit; preserve and protect core habitat and open space areas; are on or near transportation corridors; require the job quality and workforce standards...; address climate impacts in the near and long-term; and, implement land use patterns consistent with tenets of good planning. Projects that do not meet these objectives, should not be pursued.

The Housing Element Update should reflect and incorporate all of these factors and detail how they will be achieved to maximize production of needed housing, support job quality, ensure effective climate action, and implement good planning.

Specific Comments

1. First, we disagree with the statement in the staff report which states, “*The City has historically met, and plans to continue meeting, the need for low- and very low-income housing through designation of appropriately zoned land.*” This is incorrect. The City has **not met** its requirements for very-low and low income housing at all. That is why we have a significant housing problem in Escondido.

The most recent example of Palomar Heights decision highlights the issue. The site was zoned for dense development but permitted for much less. Over and over in urban Escondido, the planned designation of units does not turn into the promised density.

To address this problem, we recommend the city:

- a. Require a minimum density for development where needed and
- b. Adopt an inclusionary housing ordinance or other requirement which will result in construction of actual affordable housing like many other cities require;
- c. Commit to using some of its American Rescue Plan funding to create a city sponsored Affordable Housing Fund or Land Trust in order to ensure development of actual housing we need; and,
- d. Develop a multi-action Affordable Housing Program comprising of multiple commitments to address this issue.

2. We request revision to the strategy where the city seems to be pursuing where affordable units and market rate units are, primarily, planned to be segregated. A quick look at Table A-3 Projects under review reinforces that economic segregation. An ordinance of some kind must be adopted to require that, as project go in, affordable units must be included in the project itself to build a more inclusive community.

C. Projects Under Review

Table A-3: Projects Under Review			
Project	Description	Market Rate Units	Affordable Units
SUB 09-0005 – 1221 N. Gamble St.	3 SFR lots on 0.64 ac.	3	0
SUB 15-0019 – Safari Highlands	Specific Plan for 550 SFR lots on 1,100 ac.	550	0
Touchstone – Ivy	4 story, 95 new units. Purchased by affordable housing developer (MAAC).	0	95
SUB 15-0025, 701 San Pasqual Valley Road	18-lot TM and PD on 7 acres	18	0
ADM 19-0092, 1860 S. Escondido Vermont Apts.	44 apartments	40	4
ADM 20-0085, 322 S. Escondido	172 units	0	172
ADM 20-0011, 118 S. Orange	3 units	3	0
PHG 20-0036, 829 S. Escondido Blvd.	70 residential units	35	35
ADM 20-0070, 337 E. Valley Pkwy	50 unit affordable housing	0	50
ADM 20-0136 664 N. Fig Street	15 affordable apartment units	0	15

Source: Escondido Major Development Project Processing List, August, 2020.

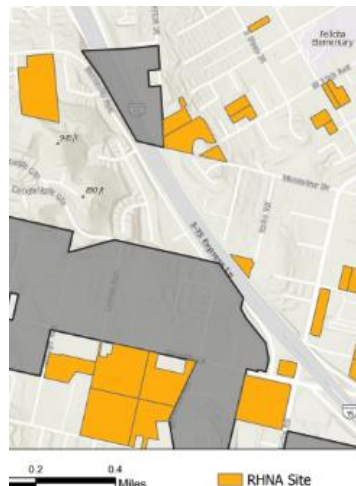
3. The 90 units from the Palomar Heights project listed under affordable housing in Table A-2 are incorrectly noted there. These units are not deed-restricted and, merely by the fact they are designated for ‘seniors’, does not mean they will be affordable. While many seniors live on very limited means, many others do not. Either the city should deed-restrict these units or take them off the guaranteed affordable housing list.

4. There is a significant disconnect in policies the city plans to pursue and the RHNA status Table 56. Although the city has significant ‘Identified’ sites for Very Low income, there are **zero** approved, undergoing entitlement, or under construction. Further, we know that ‘planned’ units may fail to materialize such as occurred with the Palomar Heights decision where 1350 units were reduce to 510 –**significantly under density and including no affordable housing**. All of this demonstrates the dire need for some kind of **guaranteed** affordable housing requirement that travels with project approvals for Above Moderate units. If there had even been a very modest 10% requirement for affordable units in a project built to the density it was planned, the current total would have yielded 135 additional affordable units.

Site Category	Above Moderate	Moderate	Low	Very Low	Total
RHNA	4,967	1,527	1,249	1,864	9,607
Units on Identified Sites	1,005	388	0	7,268	8,661
Approved and Under Construction Projects	1,357	0	245	0	1,602
Projects Undergoing Entitlement	649	0	371	0	1,020
Accessory Dwelling Units	153	262	99	126	640
Total Identified Capacity	3,164	650	715	7,394	11,923

What the city is currently doing to provide adequate affordable housing is not working. This Housing Element update is the perfect opportunity to change that.

5. In assessing the environmental health impacts on Table 58 the State CalEnviroScreen should also be incorporated as a data source.
6. RNHA sites should be selected to respect ARB guidance on air quality buffers from freeways. In both the North and South City land use designations for RHNA site show a significant number of areas that are within the 500-foot buffer that the Air Resources Board states in it Land Use Guidance document is unhealthful. Locations within 500 feet of a major freeway or heavily trafficked road should be used for commercial or other uses and not to house vulnerable residents in an area known to have a major negative impact on their health.



7. Expressed commitment to avoiding conversion of ridgetops and building on steep slopes [and in high hazard areas](#) are yet more reason that Harvest Hills should be abandoned by the city. Wasting time, energy, money, and goodwill on the pursuit of a land speculators fantasy is not appropriate.

We expect to have additional comments during the public comment period. Please contact us at conservation@sierraclubncg.org with any questions or for more information.

Sincerely,

A handwritten signature in blue ink that reads "Laura Hunter".

Laura Hunter, Chair
NCG Conservation Committee
cc. Planning Commission



North County Group
Sierra Club San Diego
P.O. Box 2141
Escondido, CA 92033

April 19, 2021

Ad-Hoc Council Housing Subcommittee
Planning Commission
City of Escondido
Via Email

RE: NCG recommendations for Draft 2021 Escondido Housing Element

Dear Councilmembers Garcia and Martinez and Commissioners:

Sierra Club North County Group (NCG) appreciates the creation of the Ad-Hoc City Council Housing Committee and the interest of the Planning Commission to take a deeper review of housing issues in Escondido and the Draft Housing Element. NCG has previously submitted extensive comments in the planning stages on both the proposed [Housing Element](#) and the [East Valley Specific Plan Update](#) and a [letter late last month](#) when the new draft was discussed. We intend to submit additional comments on a variety of topics related to the Housing Element.

Now that there is time to focus on some key changes that should be made to the draft and strategies of the city. We would like to focus in this first letter on two important actions in this letter. To summarize, we support the following actions:

- a. Adopt an inclusionary housing ordinance or other requirement which will result in a requirement to construct 10-20% affordable units with market rate housing like many other cities require;
- b. Policy to prohibit housing be built within 500 feet of a freeway. Housing within 1,000 feet should be required to include mitigation measures outlined in the CARB Technical Advisory.

Rationale

There are a couple realities that should be acknowledged so that strategies can be based on resolving these challenges.

- 1. Escondido has not produced adequate affordable housing with its 'voluntary, developer-driven' approach. We need an affordable housing requirement.**

While the city may have **designated** adequate land for very-low and low income housing, what matters is the **production** of it. This failure of actual production of affordable and workforce housing is why we have a significant housing problem in Escondido.

The practice of designation alone or market-driven voluntary strategy has not worked and must be strengthened.

The example of Palomar Heights demonstrates the failure of our current system. A site zoned for over 1,300 units, perfectly located on a transportation corridor, perfect for density, was built far under-density and with no guaranteed (deed-restricted) affordable housing.¹ If there had been even a very modest 10% requirement for affordable units in a project built to the density it was planned, the current total would have yielded 135 additional affordable units. Another example is from the April 14, 2021 Planning Commission meeting where a housing development for 120 market-rate rentals in an area zoned for 230 was approved. No deed-restricted affordable and barely 50% of the planned density for an area on a major transportation corridor.

Another issue that would be improved by requiring a percentage of housing to be affordable would be more inclusion and economic integration of residents. Without it, we are concerned that economic separation of affordable units and market rate units will continue.

Inclusionary housing policies are a critically important means to increase actually built affordable units in an economically inclusive manner.

A good working definition of inclusionary zoning is,

Local requirement[s] and/or incentive[s] for developers to create below-market rental apartments or for-sale homes in connection with the local zoning approval of a proposed market-rate development project. Often accompanied by 'density bonus' to offset the cost of providing the below market-rate units.²

Inclusionary housing is used in hundreds of communities across the country to create units that are affordable to lower-income households in new market-rate residential developments. More than 170 cities and counties in California³ and 900 country-wide⁴, have inclusionary-housing policies to help address affordable-housing needs while advancing equitable-development goals.⁵

The Local Government Commission lists some benefits of an Inclusionary Ordinance,

A well-designed ordinance can generate numerous benefits for communities seeking to increase housing affordability and develop diverse, inclusive neighborhoods. These include:

- *More choices for lower-income households about where to live.*

¹ The senior units should not be qualified as affordable units. They are not deed-restricted and, merely by the fact they are designated for 'seniors', does not mean they will be affordable. While many seniors live on very limited means, many others do not.

² Draft National Sierra Club Guidance Document for Smart Growth and Urban Infill

³ Local Government Commission, Meeting California's Housing Needs: Best Practices for Inclusionary Housing Website <https://www.lgc.org/advancing-inclusionary-housing-policy/>

⁴ Draft National Sierra Club Guidance Document for Smart Growth and Urban Infill

⁵ Local Government Commission, Meeting California's Housing Needs: Best Practices for Inclusionary Housing Website <https://www.lgc.org/advancing-inclusionary-housing-policy/>

- *Reduced opposition to affordable housing by producing affordable units within communities as they develop, not after.*
- *Support for compact infill development, reduced sprawl and achievement of local Regional Housing Needs Assessment (RHNA) targets for all income levels.*
- *Reduced vehicle miles traveled (VMT) and greenhouse gas emissions by providing people at all income levels more opportunities to live closer to work and in transit-rich areas.*
- *Ensuring that the entire community benefits from a growing economy. Public and private investments help create economic growth that raises property values. Inclusionary housing helps capture some of the value created by these investments to ensure that the benefits do not accrue solely to property owners and helps buffer against displacement pressures by ensuring that lower-income residents can remain in the community.*
- *Reduced segregation and concentration of poverty.* ⁶

Several cities in the County, including San Marcos, already have inclusionary ordinances. The County is developing one now. While Escondido has encouraged affordable housing on a voluntary basis, the voluntary, market-drive strategy has not met the need.

Further, the last two projects that have come before the Planning Commission have not proposed any affordable housing in spite of the fact that, at least one location, was designated as a RHNA location suitable for affordable housing. To understand the reason for this, we can just look to the March 23, 2021 meeting of the Planning Commission. A 60-unit infill project was proposed for South Escondido. A Commissioner asked why it didn't include any affordable housing (e.g. all market-rate), the answer was that 'it wasn't required.' This is exactly the problem. It would be nice if the voluntary effort worked, but it doesn't.

We need an affordable housing development **requirement**, such as an inclusionary ordinance or other such measure to effectively address this issue.

2. Location of housing within 500 feet of a freeway is known to be hazardous to human health and should be avoided.

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. ⁷

⁶Meeting California's Housing Needs: Best Practices for Inclusionary Housing https://www.lgc.org/wordpress/wp-content/uploads/2018/11/inclusionary-factsheet_v2.pdf

⁷AIR QUALITY AND LAND USE HANDBOOK: A COMMUNITY HEALTH PERSPECTIVE, April, 2005 <https://ww3.arb.ca.gov/ch/handbook.pdf>, page 4

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.**⁸ (emphasis added)*

Further, they found that the air quality concerns will persist even with changes to regulations and technology.⁹

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

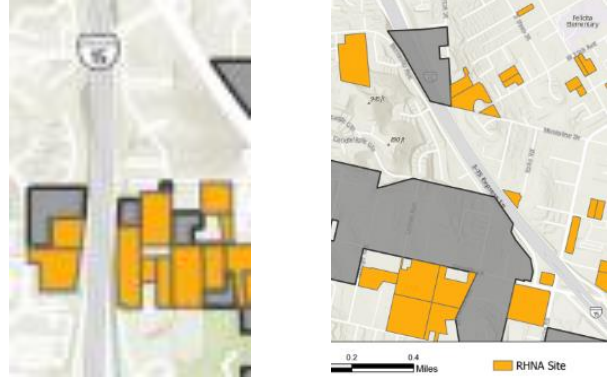
. ... In fact, planners and developers may want to consider siting non-sensitive uses and developments that will be primarily used and occupied during the daytime—such as commercial uses and offices. ... commercial and office buildings are often equipped with indoor filtration systems that can remove 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.¹⁰

⁸ 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

⁹ Ibid

¹⁰ Ibid

As you can see from these excerpts of housing locations in both the North and South City land use designations for RHNA site show a significant number of areas that are within the 500-foot buffer that the Air Resources Board states in its Land Use Guidance document is unhealthy. RNHA sites should be selected to respect ARB guidance on air quality buffers from freeways.



In closing, these are two areas that could use significant improvement in the draft 2021 Housing Element. We request that the Ad-Hoc and Planning Commission investigate and recommend the following actions.

NCG Recommendations for addressing healthful and affordable housing.

To address the issues discussed above, we request the draft Housing Element be revised to include the following:

- a. Adopt an inclusionary housing ordinance or other requirement which will result in a requirement to construct 10-20% affordable units with market rate housing like many other cities require;
- b. Policy to prohibit housing be built within 500 feet of a freeway. Housing within 1,000 feet should be required to include mitigation measures outlined in the CARB Technical Advisory.

In the future, we plan to provide additional comments and information on land value recapture policies, protection policies for renters, design and implementation of Eco-Planning Districts including urban greening, minimum densities, the danger of locating any housing in very-high fire risk zones, and other housing related policies.

Please contact us at conservation@sierraclubncg.org with any questions or for more information.

Sincerely,

Laura Hunter, Chair
NCG Conservation Committee

cc. City Manager



North County Group
Sierra Club San Diego
P.O. Box 2141
Escondido, CA 92033

April 25, 2021

Ad-Hoc Housing Committee Members Garcia and Martinez
Planning Commissioners

Via Email

RE: Additional policy and program recommendations for Escondido Housing Element

Dear Ad-Hoc members Garcia and Martinez and Planning Commissioners,

Sierra Club North County Group (NCG) is submitting this second comment letter on policy and program recommendations for the Housing Element for your discussion and consideration. NCG is still developing more specific recommendations on these topics, but hope to offer these ideas into the important discussion the city is having so that, perhaps, we can build a community consensus around how to approach our need for housing development and community investment in Escondido.

As you evaluate and discuss amendments/revisions to the Draft 2021 Escondido Housing Element, we hope you will consider further evaluation of these policies and programs.

NCG Housing Element Recommendations (Second set)

1. Establishing 'minimum density requirements' in key areas linked to development of the Regional Transportation Plan.
2. Strengthen programs a focus on low-income home ownership such as creation of a Community Land Trust and innovative programs.
3. Land Value Recapture and America Rescue Funds as means for producing additional affordable housing

Rationale

- 1. Establishing 'minimum density requirements' in key areas linked to development of the Regional Transportation Plan.**

As we see regularly, Escondido is failing to build to planned density in areas where density is appropriate and needed. Palomar Heights was a little over one third and the proposed Mercado project is just half of the planned density. We acknowledge that there are many areas where higher densities are not appropriate. However, being as we are in a climate emergency, we need to seriously plan for a carbon reduced or neutral future if our communities are to survive.

Urban infill and higher densities near transportation corridors are part of what we must do to plan for a survivable future. City plans always set ‘maximum’ allowable densities, so why not ‘minimum required’ densities in areas where we need higher density. Setting a maximum and hoping developers will build to it, isn’t working. Minimum density requirements in key transit focused areas are needed to meet the fullness and effectiveness of our urban planning efforts.

There are other benefits of these requirements as well. According to Puget Sound Regional Council Housing Innovations Committee:

Adopting minimum densities can also support other community goals such as maximizing transit investments, expanding housing choices, protecting open space, and reducing greenhouse gas emissions.¹

In 2014, Seattle adopted a minimum density program for specific areas with the purpose to:

...limit new low-density, suburban-style development that conflicts with the desired urban design and pedestrian-orientation goals of these areas. It achieved this by:

- *Preventing new development from substantially under-developing sites*
- *Preserving activity adjacent to the sidewalk*
- *Discouraging substantial parking*
- *Protecting development opportunities on sites near transit and services²*

We think these are good criteria for Escondido to consider and include in our urban planning.

Establishing minimum densities will be increasingly important and we may wish to begin with the new East Valley Specific Plan. In addition, the city could do an additional analysis to evaluate transportation corridors in existing plans and recommend minimum densities.

We recommend that Escondido tie minimum densities and up-zoning for land value recapture (see #3 below) to the plan for improved public transit currently under development at SANDAG for the new regional transportation plan.

We really can’t wait. With each urban infill project built below density, we are losing opportunities that won’t come again for a generation to provide housing and reduce our overall GHG emissions needed for a sustainable future.

2. Strengthen programs that focus on low-income home ownership such as creation of a Community Land Trust and innovative programs.

While most dedicated affordable housing are rentals, in the name of housing justice and equity, we should be working toward programs that help low-income families enter the home ownership market.

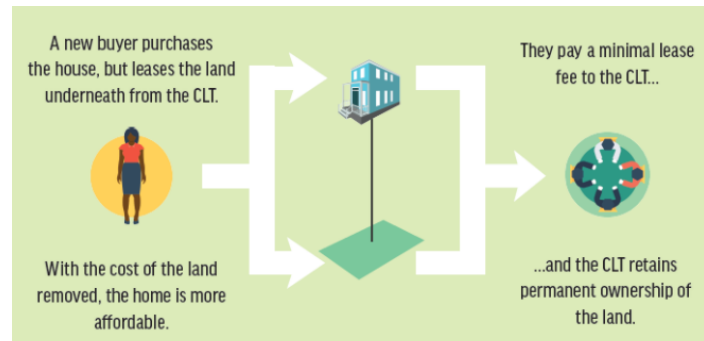
¹ Fact Sheet on Minimum Densities <https://www.psrc.org/sites/default/files/hip-min-density.pdf>

² <https://www.seattle.gov/sdci/vault/minimum-density>

Equity in a home is a major factor in creation of wealth for current and future generations of residents. Such opportunities for low and moderate income families for home ownership is something the Housing Element should address and find ways to facilitate.

One way that this can be supported is through Community Land Trusts (CLT). The model of CLTs is over 50 years old and can be adapted to meet community housing needs, including permanently affordable homeownership. CLTs are being used to support housing equity and reduce displacement. It is also an innovative way to provide affordable housing.

There are many ways a CLT can be created. Here is one model, ³



How a Community Land Trust works (Source: Church Hill People's News)

One option that might be applicable for Escondido is for the city to retain ownership of the public property it currently sells to developers (e.g. Mercado, proposed Aspire) and lease it to them instead. This could significantly lower the cost of the development (reduced land cost) and the value could be re-captured in the form of affordable housing unit-- rental and for sale.

We are sure this is more complex idea than it sounds, but we hope we will have a chance to look 'with new eyes' on this idea. Land in the urban area owned by the public (city, hospital etc...) is an important and highly valuable asset. We should develop programs that leverage and maximize that asset for the public.

An innovative organization called Grounded Solutions Network is offering a [free one hour webinar](#) on May 5, 2021 on how CLTs can be used to provide community control over important land assets. We hope that our decision-makers and staff will take an opportunity to learn more about this tactic to build homeownership in our community.

The Urban Institute reported on a non-profit organization approach that supports lower income homeownership. The New Mexico Homewise model,

... issues two mortgages—the first is for 80 percent of the home's value, and the second is for 18 percent. The first mortgage is resold on the secondary market to raise capital for additional clients, and Homewise holds on to the riskier second mortgage so that the client pays only a 2 percent down payment while still eliminating the need for mortgage

³ https://www.strongtowns.org/journal/2018/4/4/organizing-and-the-community-land-trust-model?gclid=Cj0KCQjwvYSEBhDjARIsAJMn0lgMZShrqmwUG_3vzd4U6KX3_E25Gob9S8tVehdNygkijPH-tXO2EvoaAvtyEALw_wcB

insurance. Homewise services both loans so that they can monitor loan performance on each and intervene early if there is a problem.

Homewise also offers a suite of other services including financial counseling, homebuyer education, real estate development, real estate sales, mortgage origination, and loan servicing, as well as an in-house incentivized savings program.^{4 5}

This model addresses one of the most significant barriers to home ownership-- the initial savings for a down payment. We hope that this can be evaluated as a supplement or in addition to the current city Homebuyer Entry Loan Program.⁶

Another option is to give a preference in your affordable housing RFPs/NOFAs to Low-Income Housing Tax Credit (LIHTC) projects which will ultimately sell the apartments to the low-income residents. California Tax Credit Allocation Committee Regulations dated December 21, 2020 Section 10326(j)(4) allows for apartments financed with LIHTC to be sold to low-income residents after the initial 15-year IRS regulatory period. This can be an option for the City to leverage its funding at a low ratio for the benefit of low-income buyers.

These are only three options for innovative ways to help low and moderate income residents become homeowners. We request that these, and other innovative strategies, are examined for applicability in Escondido.

3. Zoning for Land Value Recapture and America Rescue Funds as means for funding additional affordable housing

It should be remembered that, with (in our case) the punch of three buttons by the City Council, in a zoning decision can created 1,000s or millions of dollar of additional value for property to which the decision applies. Since there are strict rules about governmental decisions not eliminating property value to landowners, it seems fair that when property values are significantly increased through new zoning, the public retain some of that benefit. A great way to 'recapture value' is through requirements for affordable housing—a desperate need for the public.

In their article, *Inclusionary Housing, Incentives, and Land Value Recapture Local Housing* and planning experts Nico Calavita (San Diego State University) and Alan Mallach (Brookings Institution) discuss how many 'incentives' for inclusionary housing often just transfer costs to the public.⁷ In fact, they note that incentives and cost offsets provided to development may carry potentially high public costs.⁸ This cost to the public while the landowner accrues the increased value of the governmental action. The authors list several means by which the public ends up paying for the benefits.

⁴ <https://www.urban.org/urban-wire/innovative-model-reducing-gaps-homeownership>

⁵ <https://www.sciencedirect.com/science/article/abs/pii/S1051137717301729>

⁶ <https://www.escondido.org/Data/Sites/1/media/pdfs/Housing/FirstTimeHomebuyerProgramEnglish.pdf?v=8>

⁷ Calavita and Mallach, *Inclusionary Housing, Incentives, and Land Value Recapture Local Housing*, January, 2009, Lincoln Institute of Land Policy, p 18

⁸ *ibid*

A better idea is to recapture some of the land value increases that come about through new zoning for the public good.

Calavita and Mallach make the case that the better way to achieve integrated, inclusionary housing is *to better integrate inclusionary housing into good planning practices that begin to recapture for the public good some part of the unearned increment in land values resulting from the exercise of public land use regulatory powers.*⁹

A second funding area that we hope can be investigated is the potential use of American Rescue Funds the city will receive for the development of affordable housing. Since many people lost their jobs and some their housing, the provision of new affordable housing we think may be an acceptable and compliance use of some of the funds.

We look forward to the discussion of the Planning Commission on these topics at your April 27th meeting and hope to attend any Ad-Hoc meeting held by the Ad-Hoc Housing Committee.

Thank you for the opportunity to comment on this important planning effort. Please contact us at conservation@sierraclubncg.org with any questions or for more information.

Sincerely,



Laura Hunter, Chair
NCG Conservation Committee

cc.

Jeff Epp, City Manager

Mike Strong, Community Development Director

Karen Youel, Housing and Community Investment Director

Karla Ortega, First Time Homebuyers program manager

⁹ ibid, p 21

RESOLUTION NO. 2021-110

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF ESCONDIDO, CALIFORNIA, APPROVING THE 2021 - 2029 GENERAL PLAN HOUSING ELEMENT UPDATE, AND AN AMENDMENT TO THE GENERAL PLAN COMMUNITY HEALTH AND SERVICES CHAPTER; AND ADOPTION OF AN ADDENDUM TO AN ADOPTED EIR PREPARED FOR THE PROJECT

WHEREAS, the State of California requires cities and counties to adopt a comprehensive long-term General Plan for the social, physical, and economic development of the city and county; and

WHEREAS, California Government Code section 65588 requires all city and county General Plans to include a Housing Element, and further requires that the Housing Element be updated regularly to reflect current conditions and legal requirements; and

WHEREAS, the content of the Housing Element is mandated by the California Government Code, which also requires review by the California Department of Housing and Community Development (“HCD”) to determine compliance with State law. HCD is the state agency charged with reviewing draft and adopted Housing Elements to determine whether the element substantially complies with the statutory requirements. HCD has published multiple documents to guide local governments through the Housing Element process, all of which are available on its website; and

WHEREAS, California Government Code section 65302(g) requires all city and county General Plans to include a Public Safety Element, and further requires that the Public Safety Element be updated upon revision of the Housing Element to reflect current conditions and legal requirements; and

WHEREAS, Government Code section 65302(h)(2) requires the City to adopt an Environmental Justice Element or to adopt environmental justice goals, policies, and objectives within other General Plan elements upon the City's update to two or more other elements concurrently; and

WHEREAS, an amendment to the Community Health and Services Chapter of the General Plan has been determined to be appropriate to integrate certain environmental justice policies required pursuant to Government Code section 65302(h)(2); and

WHEREAS, the 2021 – 2029 Housing Element Update, and the amendment to the General Plan Community Health and Safety Chapter, together constitute the project ("Project"); and

WHEREAS, the City of Escondido ("City") is the lead agency, pursuant to the California Environmental Quality Act (Public Resources Code § 21000 et seq.) ("CEQA") and the CEQA Guidelines (14 California Code of Regulations § 15000 et seq.), for the Project; and

WHEREAS, the Project is considered a project as defined by the CEQA; and

WHEREAS, on May 23, 2012, the City Council adopted Resolution No. 2012-53 approving the General Plan Update, Downtown Specific Plan Update, and Climate Action Plan, and certifying and approving the Final Environmental Impact Report ("Final EIR"), CEQA Findings, Statement of Overriding Considerations, and Mitigation Monitoring and Reporting Program prepared for those documents; and

WHEREAS, the first addendum to the Final EIR was prepared for the Downtown Specific Plan Density Transfer Program, and was adopted by City Council Ordinance No. 2019-06 on May 8, 2019; and

WHEREAS, the second addendum to the Final EIR was prepared for a Downtown Specific Plan amendment to address and remove ground-floor retail requirements in key preference area. The second addendum was reviewed and considered for adoption by the City Council on August 11, 2021; and

WHEREAS, pursuant to CEQA, when taking subsequent discretionary actions in furtherance of a project for which an EIR has been certified, the lead agency is required to review any changed circumstances to determine whether any of the circumstances under Public Resources Code section 21166 and CEQA Guidelines section 15162 require additional environmental review; and

WHEREAS, City staff evaluated the environmental impact of the proposed modifications resulting from the Project in light of the standards for subsequent environmental review outlined in Public Resources Code section 21166 and CEQA Guidelines section 15162; and

WHEREAS, based on this evaluation, staff concluded that the Final EIR had fully analyzed and mitigated, where feasible, in compliance with CEQA, all potentially significant environmental impacts, if any, that would result from the Project, that the impacts to the environment as a result of the modifications are consistent with and would not create substantial new or increased impacts beyond those that were evaluated in the Final EIR, and that, therefore, no subsequent Environmental Impact Report or Mitigated Negative Declaration is now required; and

WHEREAS, as a result of the proposed modifications to the General Plan Update resulting from the Project, and to document staff's evaluation of the environmental impact

of said modifications, pursuant to CEQA Guidelines section 15164, staff prepared a third addendum to the Final EIR (“Addendum #3”); and

WHEREAS, the City’s share of the regional housing need for the 2021-2029 Regional Housing Need Allocation (“RHNA”) period is allocated by the San Diego Association of Governments based on several factors, including recent growth trends, income distribution, and capacity for future growth. Each local government must demonstrate that it has planned to accommodate all its RHNA in its Housing Element. Escondido’s share of regional future housing needs is a total of 9,607 new units for the period of April 15, 2021, to April 15, 2029; and

WHEREAS, the draft 2021-2029 Housing Element Update has been prepared to identify enough land to meet the RHNA; and

WHEREAS, in accordance with Government Code section 65585, City staff submitted a draft Housing Element to HCD prior to the adoption of a Housing Element. HCD reviewed said draft and provided written findings as to revisions required in order to meet the statutory requirements of Housing Element Law. City staff made the necessary revisions to the draft required by HCD; and

WHEREAS, all evidence of records, the 2021-2029 Housing Element Update, the General Plan Community Health and Services Chapter amendment, staff reports, correspondences, and Addendum #3 are on file in the offices of the City of Escondido Planning Division and the offices of the City Clerk and constitute the record for making the decision to approve the Project; and

WHEREAS, the Planning Division studied the Project, performed necessary investigations, prepared a written report, and hereby recommends approval of the 2021

– 2029 Housing Element Update and the General Plan Community Health and Service Chapter amendment; and

WHEREAS, the Planning Division scheduled a duly noticed public hearing regarding the Project before the Planning Commission on July 27, 2021, at which interested persons were given the opportunity to appear and present their views with respect to said Project. Following said public hearing, the Planning Commission adopted Resolution No. 2021-10, recommending that the City Council approve the Project; and

WHEREAS, prior to adopting or amending a General Plan, Government Code section 65355 requires the legislative body to hold at least one public hearing, notice of which shall be given pursuant to Government Code section 65090 and in accordance with City and State public noticing requirements; and

WHEREAS, on August 11, 2021, the City Council of the City of Escondido did hold a duly noticed public hearing as prescribed by law. At said hearing, this City Council received and considered the reports and recommendations of the Planning Commission and City staff, and gave all persons full opportunity to be heard and to present evidence and testimony respecting said matter. Evidence was submitted to and considered by the City Council, including, without limitation:

- a. Written information including plans, studies, written and graphical information, and other material, submitted as part of the Project;
- b. Oral testimony from City staff, interested parties, and the public;
- c. The staff report, dated August 11, 2021, with its attachments as well as City staff's recommendation on the Project, which is incorporated herein as though fully set forth herein; and

d. Additional information submitted during the public hearing; and

WHEREAS, the City Council has reviewed and considered the information, findings, and conclusions contained in Addendum #3, including without limitation the FINAL EIR and supporting documents; and

WHEREAS, approving the Project would repeal in its entirety the 2013-2021 Housing Element and adopt in full new text, graphics, and figures comprising the 2021-2029 Housing Element Update to the General Plan; and

WHEREAS, approving the Project would also amend the text of the Community Health and Services Chapter of the General Plan; and

WHEREAS, an original copy of the 2021 – 2029 General Plan Housing Element update, Addendum #3, and all other related Project materials are on file in the Office of the City Clerk, with a copy of each document submitted to the City Council for its consideration. The City Clerk, whose office is located at 201 North Broadway, Escondido CA 92025, is hereby designated as the custodian of the documents and other materials which constitute the record of proceedings upon which the City Council's decision is based, which documents and materials shall be available for public inspection and copying in accordance with the provisions of the California Public Records Act.

NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Escondido, California:

1. That the above recitations are true.
2. That, through the adoption of Addendum #3 to the Final EIR, all requirements of CEQA have been met.
3. That the Project satisfies the requirements of state Planning and Zoning Law.

4. That the 2021-2029 Housing Element Update and the amendment to the General Plan Community Health and Services Chapter are consistent with the Escondido General Plan because all General Plan Chapters were reviewed as part of the amendment drafting process to ensure consistency.

5. That, after consideration of all evidence presented, and studies and investigations made by the City Council and on its behalf, the City Council makes the substantive Findings of Fact and determinations attached hereto as Exhibit "A," relating to the information that has been considered.

6. That, considering the Findings of Fact and applicable law, the City Council hereby approves the 2021 – 2029 General Plan Housing Element, attached hereto as Exhibit "B," and an amendment to the General Plan Community Health and Services Chapter, attached hereto as Exhibit "C;" and adopts Addendum #3 to the Final EIR, attached hereto as Exhibit "D."

7. That the Planning Division is hereby directed to file a copy of the 2021 – 2029 General Plan Housing Element with the California Department of Housing and Community Development.

8. That, subsequent to this approval, the City will update the Community Protection Chapter of the General Plan as a separate project to address provisions of California Government Code section 65302(g), as well as provisions of California Government Code section 65302(h)(2) not addressed by this Project.

EXHIBIT "A"
PHG 20-0030
FACTORS TO BE CONSIDERED / FINDINGS OF FACT

Housing Element Update Determinations:

1. The State of California requires that cities and counties adopt a comprehensive long-term General Plan for the physical, social, and economic growth of the agency (Government Code section 65300). The Housing Element is one element of a community's General Plan. Following standard planning methodology, each element normally will consist of three parts: 1) an analysis of needs, resources, and constraints; 2) a declaration of goals and quantified objectives; and 3) programs addressing the needs and constraints and devised to achieve the goals and objectives.
2. The Housing Element is one of the required elements of the General Plan (Government Code section 65302). Detailed requirements for the content of the Housing Element are included in Article 10.6 of Chapter 3 of Division 1 of Title 7 of the Government Code, commencing with section 65580.3. The Housing Element is the only part of the General Plan that has more rigid standards and that must be reviewed and updated according to a fixed schedule. Escondido's Housing Element was last updated in 2012 for the period of January 1, 2013, through April 30, 2021. All cities and counties are required to update their Housing Element every eight years for State certification.
3. The City's 2013-2021 Housing Element no longer satisfies statutory requirements and the plan needs to be updated to meet the statutory requirements of Housing Element Law. To comply with the intent of the California Legislature, the Housing Element must address all recent housing legislation adopted in response to growing housing needs and the State's housing crisis.
4. Given the City's relatively built-out character, most of the goals and policies in the existing 2012 General Plan continue to represent the City's position on growth and development issues. Scarcity of land with adequately zoned capacity is a significant contributor to increased land prices and housing development costs. Despite these limitations, the 2021-2029 Housing Element must provide goals, policies, and programs demonstrating how Escondido will meet its existing and future housing needs for all income levels.
5. Although the City does not build the housing, the Housing Element does create a plan and regulatory framework, which provides opportunities for the private sector to do so, where market conditions determine when and where housing is built.
6. An effective Housing Element provides the necessary conditions for conserving, preserving and producing an adequate supply of housing affordable at a variety of income levels and provides a vehicle for establishing and updating housing and land-use strategies to reflect changing needs, resources, and conditions. Among other things, the

Housing Element establishes a jurisdiction's strategy to plan for and facilitate the development of housing over the eight-year planning period by providing an inventory of land adequately zoned or planned to be zoned for housing and programs to meet the needs of the community. The Housing Element also represents a policy statement about how a city or county will continue to strive toward maintaining and enhancing housing opportunities while also preserving its desirability as a place in which to live, work and play. Studies show that access to safe, decent, healthy, and affordable homes can have an impact on the health outcomes of occupants. The maintenance, improvement, and development of affordable (or relatively affordable) housing options may improve health outcomes by:

- freeing up family resources for nutritious food and expenditures;
 - providing families with greater residential stability, which may reduce stress, and related adverse health outcomes;
 - increasing the control that homeowners or renters have over their physical environment and minimizing the disruptions associated with frequent, unwanted moves;
 - allowing victims of domestic violence or abuse to escape, which can lead to improvements in mental and physical health and safety;
 - alleviating overcrowding to reduce potential exposure to stressors and infectious disease, leading to more space per individual and better social distancing practices, which can lead to improved physical and mental health;
 - enhancing access neighborhoods of opportunity to increase access to selective amenities and generate important health benefits based on the social and physical environment in which the home is located;
 - linking supportive services to home occupancy to enable target populations and others with mobility limitations to remain in their homes;
 - improving the quality of housing to address indoor air quality, home safety and other environmental pollutants such as the presence of mold, asbestos, or lead; and
 - improving the quality of housing to be more energy efficient in order to lower monthly energy costs and improve home comfort and indoor environmental quality.
7. This Project evaluates housing needs in Escondido based on its demographic and housing characteristics. The 2021-2029 Housing Element Update also analyzes existing and potential constraints to the production of affordable housing. It includes an inventory of resources available to accommodate the identified housing needs; assesses the effectiveness and appropriateness of existing City housing programs; and sets forth crafts a housing strategy to address the housing issues related to housing availability, adequacy, and affordability.
8. The 2021-2029 Housing Element Update would not be detrimental to the public interest, health, safety, convenience, or welfare of the City because the Project will benefit the

community by encouraging the City' participation in programs that provide home ownership opportunities for individuals and families; facilitating the development of housing for all income levels for the 2021-2029 planning period. The 2021-2029 Housing Element Update identifies housing goals and policies to address the City's fair share of the regional housing needs, while encouraging improvement and enhancement of existing residential neighborhoods.

9. In addition to the particular Government Code sections cited above and within the July 27, 2021, Planning Commission Staff Report, other sections call for a local jurisdiction's zoning and density laws to be structured to ensure that any changes to zoning or density designation result in no net loss of density or an inability to accommodate its fair share of housing needs. The manner in which Escondido meets this requirement is described in detail in the Housing Resources Section of this Housing Element Update.
10. The California Department of Housing and Community Development ("HCD") plays the critical role of reviewing every jurisdiction's Housing Element to determine whether it complies with state law and then submits written findings back to each local government. HCD's approval is required before a local government can adopt its Housing Element as part of its overall General Plan. Revisions to the draft Housing Element were made in response to HCD's most recent correspondence (May 25, 2021) in order to be deemed compliant with State Housing Element law, as amended, and all other federal, state, and local requirements, as necessary to demonstrate compliance with State law and gain State certification.
11. Once adopted, the 2021-2029 Housing Element Update will have a binding effect on the City. Most other planning actions such as adoption of a specific plan or zoning ordinance, approval of a subdivision map, etc. must be consistent with the General Plan. Known as the "consistency doctrine," it gives the General Plan, including the 2021-2029 Housing Element Update, the controlling force of law.
12. General Plan Consistency: The City is able to meet its RHNA requirement without any changes to General Plan designations or densities allowed. Revised policies are included in the 2021-2029 Housing Element Update, updating existing major strategies and policies from the 2013-2021 Housing Element. All such draft strategies and policies build upon, augment, or refine existing strategies and policies of the current General Plan, and they introduce no new policies that would conflict with existing General Plan elements having the most direct relation to allowable use and development, such as land use, circulation, or safety element policies. Similarly, the 2021-2029 Housing Element did not eliminate any existing strategies for its programmatic approach to housing, and therefore remains consistent with the other Chapters of the General Plan.

Community Health and Services Chapter Determinations:

1. In March 2021, the City Council adopted the Climate Action Plan, and the specific actions that Escondido would do to address climate change and reduce its greenhouse gas ("GHG") emissions and promote climate change adaptation and resiliency. The Project proposes to incorporate the Climate Action Plan by reference to ensure consistency between documents and guide the policy development around issues related to public health, social equity, and environmental justice.
2. The California Government Code section 65040.12 defines "Environmental Justice" as: "The fair treatment and meaningful participation of people of all races, culture and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies." Environmental justice policies and laws have been established to ensure that all people, regardless of race, color, national origin or income, have equal protection from environmental hazards where they live, work and play. Environmental justice communities are those areas of the City that have higher pollution burdens and vulnerabilities than other areas, and therefore are most in need of assistance. Environmental justice communities can be defined both by characteristics of the population and the pollution burden they bear.
3. All people, regardless of socio-economic status, should have the equal ability to participate in, and influence, the decision-making process regarding environmental regulations.
4. General Plan Consistency: The Community Health and Services Chapter must be consistent with the other General Plan elements. Text amendments to this chapter do not conflict with other chapters of the General Plan because they provide more specific information related to existing goals, policies and programs which are already consistent with the other General Plan elements.



City of Escondido Sixth Cycle Housing Element 2021-2029

June 2021

Community Development Department

201 North Broadway

Escondido, CA 92025

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1. Introduction

The Housing Element is a component of the General Plan that assesses the housing needs of all economic segments of the City of Escondido. In addition, the Housing Element defines the goals and policies that will guide the City's approach to resolving those needs and recommends a set of programs that would implement policies over the next few years.

State law requires that all cities adopt a Housing Element and with prescribed details and content. This Housing Element responds to those requirements, and responds to the special characteristics of the City's housing environment. The Element incorporates the most current data readily available at the time of writing and an evaluation of the Housing Element adopted in 2013. Also included are assessments of the current and potential housing actions, and resources of the private sector and all levels of the public sector.

This Escondido Housing Element is prepared for the 2021-2029 update (Sixth cycle) for jurisdictions in the San Diego Association of Governments (SANDAG) region.

The Housing Element's Purpose

The Housing Element is concerned with specifically identifying ways in which the housing needs of existing and future residents can be met. This Housing Element covers the planning period of April 15, 2021 to April 15, 2029, and identifies strategies and programs that focus on:

- Conserving and improving existing affordable housing;
- Providing adequate housing sites for meeting the projected housing demand;
- Assisting in the development of affordable housing;
- Removing governmental and other constraints to housing development; and
- Promoting equal housing opportunities.

A. Escondido's General Plan Vision

The City of Escondido envisions itself becoming the vibrant and dynamic cultural, economic, and recreational hub of inland North San Diego County. This vision calls for an outstanding quality of life with exemplary public services and a safe environment that support a wide-range of housing types; quality educational facilities; desirable workplaces offering diverse employment opportunities; convenient transportation options, and unique cultural / recreational amenities. A lively, active downtown with unique and exciting land uses and a revitalized surrounding urban core are the focus for appropriate higher-intensity infill developments that maximize opportunities for alternative transportation, and strengthen pedestrian linkages. Planning for quality, managed growth ensures the adequate provision of infrastructure, preserves perimeter viewsheds, respects and enhances the character of established single-family neighborhoods, and assures long-term

sustainability for Escondido's future. This Housing Element provides policies and programs that will allow the City to achieve this vision.

B. Escondido's Housing Element Outline

The 2021-2029 Escondido Housing Element consists of the following major components:

- Introduction: An overview of the purpose and contents of the Housing Element.
- Housing Needs Assessment: An analysis of the demographic and housing characteristics and trends.
- Housing Constraints: A review of potential market, governmental, and environmental constraints to meeting the identified housing needs.
- Housing Resources: An evaluation of resources available to address housing goals.
- Housing Plan: A strategy to address the identified housing needs given the City's constraints and resources.

An evaluation of the City's achievements in implementing the 2013 Housing Element is also included in the appendix.

C. Community Context

Escondido is located in the North Central portion of San Diego County. Its natural setting, Mediterranean climate, rolling hills, and location at the intersection of two state highways provide a unique and attractive living environment. This setting has a substantial impact on the employment characteristics as well as the City's economic base. These conditions attract growth, which in turn creates a competitive residential atmosphere.

Escondido has experienced significant residential development since 1970. It is crucial that public services expand to meet the needs of the increasing population. These services include sewers, streets, police, fire, schools, and recreation. It is also important to locate housing to be accessible to other functions such as employment, services, shopping, and transportation.

In 2020, the City population was 153,008, an increase of about six percent in the last ten years. During this same period, the housing stock increased by approximately two percent. The growth in population has, in turn, increased diversity within the City. From 2010 to 2020, Escondido became more racially and ethnically diverse. The population of White residents has continued to decrease from 68% in 2000 to 35% in 2020. Meanwhile, the City's population of Hispanic residents has increased from 39% to 52%. The City's Asian population has also increased from four percent in 2000 to seven percent in 2020.

The 2018 American Community Survey (ACS) Five-Year estimates reported an increase in average household size from 3.06 persons per household in 2010 to 3.21 persons in 2018. This trend can be partially attributed to the increase in families with children and the shift in racial and ethnic composition, since many Asian and Hispanic households are typically larger than White households.

Escondido offers a mix of housing types. Single-family homes make up about 57% of the housing stock, the multi-family share is about 36%, and mobile homes comprise the remaining eight percent. Over three-fourths (76%) of Escondido's housing stock is over 30 years old (built before 1990), with approximately 10% of the housing stock being built before 1969 (over 50 years old).

The median price of a single-family home in Escondido is estimated at about \$540,000 as of 2019. Apartment rents range from \$1,490 for a one-bedroom apartment to \$2,273 for a three-bedroom apartment. Lower income households in the City are unable to afford homeownership and affordable rental options are also limited. The City has been actively addressing its housing issues by developing affordable housing, improving the existing housing, and providing assistance to households in need.

D. Public Participation

The City of Escondido envisions itself as a sustainable community through various environmental, economic, health, and social equity initiatives. The ability to increase housing production and preservation is a key factor to a sustainable future. To accomplish this, the Housing Element must provide goals, objectives, policies, and implementation programs demonstrating how Escondido will meet its existing and future housing needs for all income levels. Although the City does not build the housing, the Housing Element does create a plan and regulatory framework, which provides opportunities for the private sector to do so, where market conditions determine when and where housing is built. In order to make sure that the City develops a good "housing" strategy, the City needs to identify all types of community-supported solutions.

The City was awarded Senate Bill ("SB") 2 grant funding in 2020 to develop three different housing studies and plans: a Housing Element Update, a Sector Feasibility Study, and an East Valley Specific Plan. These three housing studies and plans will be linked together, through a common work program theme, called the "Housing and Community Investment Study." The coordination of the three studies helps identify a comprehensive vision for maintaining, preserving, and developing housing to address Escondido's quality of life needs. Through the consolidated work program, the City undertook a strategically focused public involvement process to help engage residents, businesses, and other community members in the development of three different housing studies and plans. Since the Housing Element, Sector Feasibility Study, and East Valley Specific Plan are related to each other, consolidating the work program in terms of project management into one project helped ensure that public participation-related activities and tasks were grouped to be more efficient. This in turn led to more effective public outreach and more-informed community engagement.

Components of the Housing and Community Investment Study

The Housing and Community Investment Study ("HCIS") identifies the City's housing needs and establishes clear goals and objectives to inform future housing decisions. This important effort will guide Escondido's future housing policy creation and implementation. It will address things like how

best to increase or accommodate affordability, substandard housing rehabilitation, existing demand for new housing, eliminating housing development constraints, and fair housing.

The Housing Element Update identifies:

- Policies for new housing construction, rehabilitation and conservation of the existing affordable housing stock.
- The current Housing Element sets a number of ambitious goals to increase housing production and preservation, ensure neighborhood livability, prevent discrimination, and end homelessness. This foundation has allowed Escondido to advance a progressive set of programs and initiatives to develop and preserve both market-rate and affordable housing. This update presents an opportunity to build on that foundation as we continue to address the housing crisis.

The Sector Feasibility Study identifies:

- Market information about how new development could be financed, and assess if, and to what degree, housing development is financially/economically feasible under rising construction, land, and regulatory costs.

East Valley Specific Plan identifies:

- A comprehensive planning and zoning scheme for an area just east of the former, downtown hospital campus.
- Opportunity sites ready for development. The area map shows the location of potential re-visioning.
- New ways to accommodate streamlined housing with community-supported solutions.

Public Participation of the HCIS

A goal of the HCIS was to ensure that the future housing accommodation strategies embraced the distinct identity and character of Escondido where one can live their entire life with housing for all ages, incomes and abilities. For that purpose, a Public Participation Plan was developed to help create meaningful outreach engagement activities. During the course of the Study, the City worked with development experts, community-based interest groups, stakeholders, and the community at large to achieve the best plan possible through engagement tools including meetings, community workshops, and online engagement. Information about the first and second phase of outreach is available and provided on the City's website (<https://www.escondido.org/hcis.aspx>) and summarized below.

First Phase of Outreach

The first phase of outreach of the HCIS focused on developing background information and feedback on overarching housing issues and concerns:

- Direct mailers, electronic e-mail blasts, and electronic flyers in English and Spanish

- Planning Commission and City Council meetings and status updates
- July 23, 2020 virtual workshop (English and Spanish services)
- Presentation Videos posted online (English and Spanish recordings)
- For Residents:
 - East Valley Specific Plan downloadable comment forms: English and Spanish
 - East Valley Specific Plan online form to submit comments
 - Housing Element online survey (July 2020 - December 2020): English and Spanish
- For Businesses:
 - East Valley business survey (August 2020 - September 2020): English and Spanish
 - Housing Element online survey (July 2020 - December 2020): English and Spanish

Second Phase of Outreach:

The City explored different strategies to develop more housing to meet state housing requirements and to meet its goals for maintaining community identity. Public feedback in the second phase of outreach was utilized to determine the locations and densities of new housing options.

- Direct mailers, electronic e-mail blasts, and electronic flyers in English and Spanish
- October 7, 2020 virtual workshop (English and Spanish services)
- Presentation Video posted online "Land Use Alternative Workshop" (English and Spanish recordings)

Housing Element Study Sessions

The City conducted two study sessions in March 2021, one before the Planning Commission (March 23) and one before the City Council (March 24) to review the Draft Housing Element.

Consideration of Community Feedback

The joint planning process for the EVSP Specific Plan and Housing Element included the outreach and participation of community members, business stakeholders and interest groups. Overarching comments received from the two rounds of community involvement for the EVSP included:

- Providing affordable to moderate income housing
- Promoting walkability through mixed use buildings and complete streets concepts
- Enhancing streetscapes and building frontages through design and amenities
- Creating more public open space for the residents and visitors
- Providing affordable housing with appropriate design standards
- Including parks and urban canopy as these are important concepts for an urban setting
- Mindfully establishing parking standards to accommodate future and current needs
- Allowing for community services and other existing uses while facilitating new opportunities

Using community input gathered in the first phase of outreach, three Land Use Alternatives were developed for the City and community to assess and select a Preferred Land Use Alternative. The Preferred Land Use Alternative acts as a base in which the East Valley Specific Plan establishes the land uses, circulation network, design guidelines, and design standards. During the outreach activities, the community was informed that a significant portion of the City' RHNA would be accommodated in this new growth area. Input gathered through this second outreach effort was folded into the Preferred Land Use Alternative, which is presented in the EVSP.

More generally related to housing across the entire City, the Housing Survey asked residents to rank housing challenges and needs across different categories. Overall, respondents ranked items as follows:

- Greatest housing challenges: housing costs, fair housing services, and neighborhood physical conditions
- Groups with greatest need: young adults, large households, former homeless
- Greatest housing stock need: ADUs, housing for formless, housing for persons with disabilities
- Most important housing programs/activities: affordable housing, homelessness, first-time homebuyers.

The City also received oral and written public comments during the Planning Commission meetings on the draft Housing Element. Comments focused on implementing an inclusionary ordinance, minimum density requirements, value recapture requiring affordable housing, and homeownership opportunities for lower income households.

To address concerns related to fair housing, Escondido has included Program 3.4. Escondido will continue the enforcement of the Fair Housing Action Plan and continue to contract with the Legal Aid Society of San Diego to provide fair housing services. Program 3.2, Focus on Neighborhoods, utilizes proactive code enforcement, housing rehabilitation, and capital improvement to improve physical conditions of Escondido neighborhoods.

As part of the Housing and Community Investment Study (HCIS), the City conducted a housing sector feasibility study to evaluate housing construction viability under different affordability scenarios. The Sector Feasibility Study explores all the direct and indirect costs associated with new construction to better understand market conditions and patterns of housing and community development policy, including the benefit/impact of potential inclusionary housing programs. The results of the 2021 study showed that even a 10% inclusionary requirement makes housing construction infeasible at higher residential densities. That is, an inclusionary requirement has been determined, by substantial evidence, to be a potential constraint to new home construction at the default densities deemed appropriate to accommodate housing for lower income households (30 units per acre). It is important to note that most of the sites suitable for near term development in the City are at densities that are at or exceed 30 units per acre. Development expected under the existing regulations and partnerships, or even through the programmed implementation of the 2021-2029 Housing Element, would help the City determine if more affordable housing can be achieved

through various zoning incentives or subsidies – or identify such opportunities, and then seek their implementation.

The East Valley Specific Plan (EVSP) requires minimum densities of 21 units/acre in the EV-U-5 zone and 30 units/acre in the EV-MU zone. The EVSP and Downtown Specific Plan also include a Density Transfer Program, allowing the City to transfer densities from vacant or underutilized sites to other properties in the Plan Area, enabling an increase in density beyond what is allowed under the current density (see Program 1.2). The transferred density will be held in a Density Credit Pool.

The City has included Program 2.2, First-Time Homebuyer Assistance, to assist lower income first-time homebuyers. The program utilizes HOME funds and aims to assist one household annually. The City will also actively pursue funding to expand this program. Program 2.4, Mobile Home Park Conversion, to assist applicants applying for funding from HCD to pursue mobile home park conversion to resident ownership.

Public Review of Draft Housing Element

The Draft Housing Element has been available for public review on City website since March 19, 2021. The City will continue to provide updated versions of the Draft Housing Element for public review.

E. Data Sources and Methodology

In preparing the Housing Element, various sources of information are consulted. The 2000 and 2010 Census provides the basis for population and household characteristics. Unfortunately, the 2020 Census data is not scheduled to be released in time for the preparation of this Housing Element. As of the writing of this Housing Element (February 2021), no 2020 Census data has been released. Therefore, several sources are used to provide reliable updates to the 2010 Census, including the following:

- 2014-2018 American Community Survey by the Census Bureau
- Population and demographic data updated by the State Department of Finance
- Housing market information, such as home sales and rents, from Corelogic and Zillow, among other sources
- Lending patterns from the Home Mortgage Disclosure Act (HMDA) database
- Labor statistics from California Employment Development Department

F. General Plan Consistency

According to State planning law, the Housing Element must be consistent with the other General Plan elements. Certain goals and policies of each element may also address issues that are primary subjects of other elements. This integration of issues throughout the General Plan creates a strong basis for the implementation of plans and programs and achievement of community goals. Amendments to the Community Health and Services Chapter have been made concurrent with this update, and the Community Protection Chapter will be amended as required by State law.

The Escondido General Plan includes the following elements:

- Land Use and Community Form
- Mobility and Infrastructure
- Housing
- Community Health and Services
- Community Protection
- Resource Conservation
- Growth Management
- Economic Prosperity

This Housing Element is consistent with the policies and proposals set forth by the updated General Plan, but also incorporates new development opportunities offered by the East Valley Specific Plan. The Safety Element was also updated concurrent with the Housing Element update.

When an element in the General Plan is amended in the future, the Housing Element will be reviewed and modified if necessary to ensure continued consistency among the various elements. The City will ensure that updates to these Elements achieve internal consistency with the Housing Element.



2. Housing Needs Assessment

The City strives to achieve a balanced housing stock that meets the varied needs of all income segments of the community. To understand the City's housing needs, the nature of the existing housing stock and the housing market are comprehensively evaluated. This section of the Housing Element discusses the major components of housing needs in Escondido, including population, household, economic, and housing stock characteristics. Each of these components is presented in a regional context, and, where relevant, in the context of other nearby communities. This assessment serves as the basis for identifying the appropriate goals, policies, and programs for the City to implement during the 2021-2029 Housing Element cycle.

A. Population Characteristics

Understanding the characteristics of a population is vital in the process of planning for the future needs of a community. Population characteristics affect the type and amount of housing need in a community. Issues such as population growth, race/ethnicity, age, and employment trends are factors that combine to influence the type of housing needed and the ability to afford housing. The following section describes and analyzes the various population characteristics and trends that affect housing need.

Population Growth

According to the California Department of Finance population estimates, the City population in 2020 was 153,008, increasing from 133,559 in 2000 and 143,911 in 2010. Between 2010 and 2020, the City population increased by approximately 10,000 people, representing an increase of approximately six percent (Table 1). During the same period, San Diego County population increased by eight percent. The City population as a proportion of the County population has remained the same over the past 30 years (4.6%).

Table 1: Population Growth (2000-2020)

	2000	2010	2020	2000-2010	2010-2020
Escondido	133,559	143,911	153,008	7.8%	6.3%
San Diego Region	2,813,833	3,095,313	3,343,355	10.0%	8.0%
Escondido as a % of the County	4.7%	4.6%	4.6%	-2.0%	-1.6%

Sources: Bureau of the Census, 2000, and 2010; California Department of Finance, 2020.

Age Characteristics

A community's current and future housing needs are determined in part by the age characteristics of residents. Typically, each age group has distinct lifestyles, family types and sizes, ability to earn incomes, and therefore, housing preferences. As people move through each stage of life, housing needs and preferences change. Traditional assumptions are that the young adult population (20 to 34 years old) tends to favor apartments, low to moderate cost townhomes/condominiums, and smaller single-family units.

The adult population (35 to 64 years old) represents the major market for moderate to relatively high cost condominiums and single-family homes. The senior population (65 years and older) tends to generate demand for low to moderate cost apartments and condominiums, group quarters, and mobile homes. In order to create a balanced community, it is important to provide housing options that suit the needs of various age groups.

In 2010, 31% of residents in the City were under the age of 20 years, 23% were young adults between 20 and 34 years, 36% were mature adults between 35 and 64 years, and 10% were elderly persons over 65 years of age (Table 2). According to the 2014-2018 ACS, the age distribution of Escondido residents was as follows: 28% of residents in the City were under the age of 20 years, 25% were between 20 and 34 years, 36% were between 35 and 64 years, and 11.6% were over 65 years of age. Overall, the City's population is aging, with the median age increasing from 32.5 to 33.8 between the 2010 Census and the 2014-2018 ACS. Figure 1 shows that the proportion of population for all age categories under 55 has decreased between 2010 and 2018 (except for 25 to 34 years old) while population over 55 at all age categories has increased (except 75+ years old).

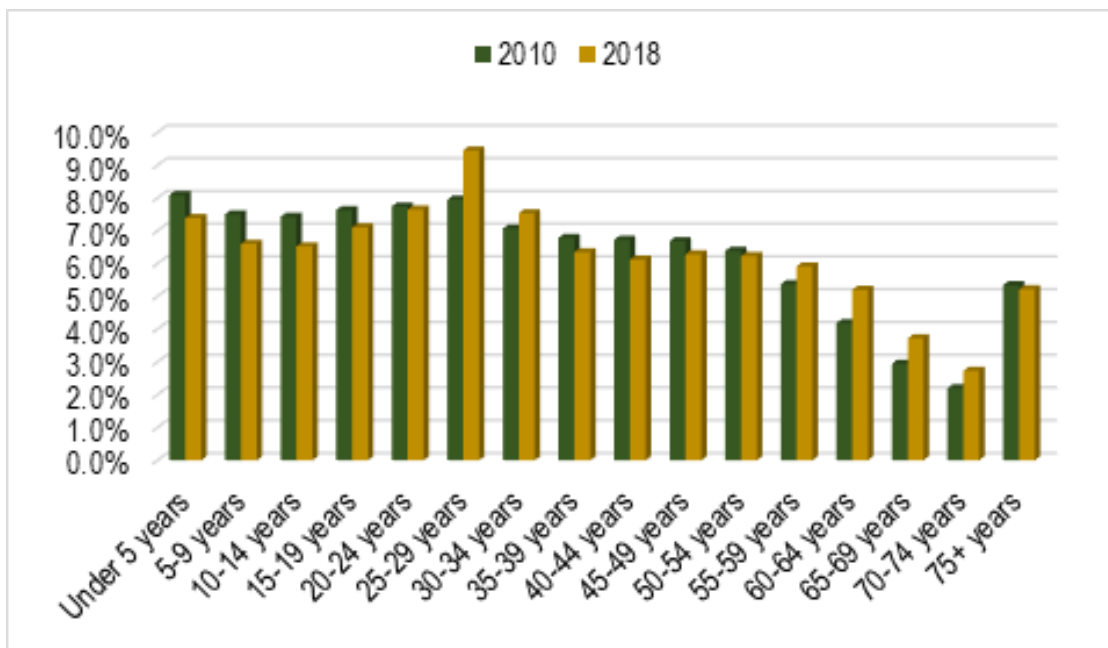


Table 2: Age Distribution (2010-2018)

Age	2010		2018	
	Total	% of Total	Total	% of Total
Under 5 years	11,638	8.1%	11,164	7.4%
5-9 years	10,795	7.5%	9,976	6.6%
10-14 years	10,686	7.4%	9,858	6.5%
15-19 years	10,976	7.6%	10,735	7.1%
20-24 years	11,138	7.7%	11,554	7.6%
25-29 years	11,436	7.9%	14,280	9.4%
30-34 years	10,167	7.1%	11,383	7.5%
35-39 years	9,759	6.8%	9,589	6.3%
40-44 years	9,681	6.7%	9,246	6.1%
45-49 years	9,617	6.7%	9,490	6.3%
50-54 years	9,190	6.4%	9,418	6.2%
55-59 years	7,725	5.4%	8,937	5.9%
60-64 years	6,019	4.2%	7,853	5.2%
65-69 years	4,237	2.9%	5,619	3.7%
70-74 years	3,162	2.2%	4,125	2.7%
75+ years	7,685	5.3%	7,888	5.2%
Total	143,911	100.0%	151,115	100.0%
Median Age	32.5		33.8	

Source: Bureau of the Census, 2010 Census; American Community Survey, 2014-2018.

FIGURE 1: AGE COMPOSITION (2018)



Race/Ethnicity

Race/ethnicity of the population is important to an analysis of housing needs and conditions for several reasons. The cultural influences of races are often reflective of preferences for housing type, location of housing, associated services, and household composition. For example, the concept of “extended family” can have implications on the definitions of overcrowding and housing conditions. The racial and ethnic composition of a community’s population should also be more carefully examined at the neighborhood level. In general, Hispanic and Asian households exhibit a greater propensity than White households for living in extended families. However, with the rising housing crisis in California, and the recent economic challenges presented by COVID-19, extended family members sharing housing arrangements or adult children moving back with parents have become a trend in many California communities.

Escondido, like many communities throughout California, has experienced gradual changes in the racial and ethnic composition of its population. According to the 2010 Census, White residents (40%) no longer comprised the largest racial/ethnic group in the community. The proportion of White residents continued to decrease, comprising only 36% of the population by 2018. Meanwhile, the City’s Hispanic residents now make up over half (52%) of the City’s population a two percent increase since 2010 (Table 3).



Table 3: Race and Hispanic Origin (2018)		
Race and Ethnicity	Number	Percent
Non-Hispanic Races		
White	53,623	35.5%
Black or African American	3,302	2.2%
American Indian	553	0.4%
Asian	10,032	6.6%
Native Hawaiian and Other Pacific Islander	380	0.3%
Some other race	299	0.2%
Two or more races	4,545	3.0%
Hispanic	78,381	51.9%
Total	151,115	100.0%
Source: American Community Survey, 2014-2018.		

B. Economic Characteristics

Employment has an important impact on housing needs. Incomes associated with different jobs and the number of workers in a household determines the type and size of housing a household can afford. In some cases, the types of jobs themselves can affect housing needs and demand (such as in communities with military installations, college campuses, and large amounts of seasonal agriculture). Employment growth typically leads to strong housing demand, while the reverse is true when employment contracts. In addition, the relationship between the location of housing and the location of employment has an impact upon transportation systems. Escondido is north of the major employment centers in San Diego County and, to a lesser extent, east of other areas in northern San Diego County.

Employment

The San Diego region currently has a smaller share of its employment in manufacturing than California and the nation. The decline in the proportion of jobs in manufacturing has been progressing for more than half a century nationwide. During the 1990s and continuing after 2000, the region’s economy continued to diversify away from manufacturing and defense-related industries. Manufacturing’s share of total non-farm employment fell from 12.8% in 1990 to 10.3% in 2000 and 9.2% during 2014-2018, following a similar trend for the state and the nation. Conversely, service occupations now comprise about 19.5% of the employment according to the 2014-2018 ACS.

The earnings gap between low- and high-paying jobs has also widened because of unbalanced job growth and the region’s capacity for low-paying jobs has increased through public and private investments in low value-added industries, such as tourism, entertainment, and retail trade, without compensating investments for high value-added industries. However, as digital technology continues to improve, fostering online shopping and streaming of entertainment, entertainment and retail jobs may be in jeopardy and are certainly most impacted by the Coronavirus pandemic.



As of September 2020, unemployment rate in Escondido was reported by the State Employment Development Department at 8.5%, below the regional average of 9.0% and the statewide average of 11.0%. The current COVID-19 crisis is expected to have long-lasting impacts on the economy. The “pre-COVID” unemployment rate in Escondido was reported at 4.0% as of March 2020. The impacts of COVID-19 on housing affordability and housing problems (such as cost burden) are expected to worsen, although no data is available yet to substantiate the projections.

Table 4 highlights the difference in employment composition in Escondido versus the region. The table shows that employment in the agriculture and mining, construction, manufacturing, transportation, communication and utilities, wholesale trade, and public administration sectors are higher in Escondido. Compared to the region, Escondido has a lower proportion of higher paying jobs in the finance/real estate insurance, retail trade, and professional services sectors. Of course, it is important to note that this data set largely ignores the growing number of Escondido residents that have a single part-time job, multiple part-time jobs, or have other sources of income such as that from the gig economy, rather than traditional full-time employment.

Table 4: Employment Characteristics - (2010-2018)

Industry Sector	2006-2010 ACS		2014-2018 ACS		Median Earnings (Escondido 2018)
	% of Escondido Employment	% of Region Employment	% of Escondido Employment	% of Region Employment	
Agriculture, Mining	2.0%	0.7%	2.3%	0.9%	\$ 23,727
Construction	11.1%	7.2%	9.3%	5.9%	\$33,206
Manufacturing	11.5%	9.2%	9.6%	9.2%	\$ 41,896
Transportation, Communication, Utilities	2.7%	2.9%	3.3%	2.4%	\$ 36,638
Wholesale Trade	12.7%	10.8%	12.5%	10.5%	\$24,421
Retail Trade	2.6%	3.8%	3.9%	4.1%	\$47,267
Finance	1.9%	2.5%	1.6%	2.2%	\$50,231
Real Estate, Insurance	5.4%	7.4%	4.8%	6.2%	\$39,682
Professional Services	12.1%	14.2%	14.2%	15.1%	\$32,035
Education, Health, and Social Services	16.9%	19.9%	17.3%	21.3%	\$32,783
Arts, Recreation, Entertainment	11.4%	10.6%	11.6%	11.9%	\$20,236
Other Services	6.5%	5.2%	7.0%	5.4%	\$20,310
Public Administration	3.3%	5.4%	2.4%	5.0%	\$59,136
Total	100.0%	100.0%	100.0%	100.0%	\$30,993

Sources: Bureau of the Census, 2006-2010; American Community Survey, 2014-2018. 2018 Census San Diego County Median Household Income = \$81,500



Salary/Income

Table 5 displays mean annual wage data for occupations compiled by the California Employment Development Department (EDD) for the San Diego Metropolitan Statistical Area. Table 5 shows that the food preparation and serving, farming, fishing and forestry, personal care, and healthcare support occupations offer the lowest wages.

According to the ACS, approximately 14% of Escondido residents work at educational, health and social services occupations. Education and social services usually generate employment at the moderate income levels. Other major employment sectors for Escondido include arts, recreation and entertainment (17.3%) and wholesale trade (12.5%); both provide generally jobs at lower to moderate scales. Also refer to the next section regarding Escondido household incomes.

Occupations	Average Salary
Management	\$136,531
Legal	\$120,265
Computer and Mathematical	\$104,627
Healthcare Practitioners and Technical	\$102,053
Architecture and Engineering	\$99,949
Life, Physical and Social Science	\$87,579
Business and Financial Operations	\$80,850
Education, Training and Library	\$66,690
Arts, Design, Entertainment, Sports and Media	\$61,614
Construction and Extraction	\$60,047
Protective Service	\$58,837
Community and Social Service	\$56,793
Installation, Maintenance and Repair	\$54,945
Sales	\$45,974
Office and Administrative Support	\$45,385
Production	\$43,823
Transportation and Material Moving	\$39,362
Building, Grounds Cleaning, and Maintenance	\$36,248
Healthcare Support	\$35,609
Personal Care and Service	\$34,806
Farming, Fishing and Forestry	\$33,243
Food Preparation and Serving Related	\$31,942
All Occupations	\$61,770

Source: California Employment Development Division, Occupational Employment Statistics (OES), Q1, 2020.

C. Household Characteristics

The Census defines a "household" as all persons who occupy a housing unit, which may include single persons living alone, families related through marriage or blood, or unrelated persons sharing living quarters. Persons living in retirement or convalescent homes, dormitories, or other group living situations are not considered households. Furthermore, the Census classifies households by type according to the gender of the householder and the presence of relatives. Household characteristics such as size, type, income and tenure reveal important information about the housing needs of a community. Different household sizes, types and income levels often prefer different housing options.

According to the 2020 California Department of Finance housing estimates, there were 1,226,879 households (also known as occupied housing units) in San Diego County. Of these, 49,211 households, or approximately four percent, were located in Escondido.

Household Type and Size

Different household types generally have different housing needs. Seniors or young adults usually comprise the majority of the single-person households and tend to reside in apartments, condominiums or smaller single-family homes. Families with children often prefer single-family homes.

Escondido had 43,817 households in 2000. By 2010, this number grew marginally to 44,574, an increase of two percent. The number of households in Escondido increased another four percent to 46,338 households by 2018. Table 6 shows that, increasingly, Escondido households are comprised primarily of families. However, the greatest change between 2010 and 2018 was the increase in other 'non-traditional' families, including single parents. Married couples with children and single households living alone experienced numerical and proportional decreases.

According to the 2014-2018 ACS, 72% of the Escondido households were family-households. Of the City's family households, 36% were married couples with children under the age of 18 and 34% were married couples without children. The proportion of other families continued to grow, representing 31% of all family-households.

Approximately 28% of Escondido households were non-family households with the majority of them (72%) being residents living alone. By 2018, the average household size in the City increased to 3.21 and the average family size increased to 3.69.



Table 6: Changes in Household Types (2010 – 2020)

Household Types	2010		2020		Change 2010-2020	
	#	%	#	%	#	%
Families	31,816	71.4%	33,324	71.9%	1,508	4.7%
Married with Children	12,419	39.0%	11,819	35.5%	-600	-4.8%
Married, no Children	10,587	33.3%	11,227	33.7%	640	6.0%
Other Families	8,810	27.7%	10,278	30.8%	1,468	16.7%
Non-Families	12,758	28.6%	13,014	28.1%	256	2.0%
Single- Living Alone	9,940	77.9%	9,324	71.6%	-616	-6.2%
Other Non-Families	2,853	22.4%	3,690	28.4%	837	29.3%
Total Households	44,574	100.0%	46,338	100.0%	1,764	4.0%
Average Household Size	3.06 persons		3.21 persons		4.9%	
Average Family Size	3.58 persons		3.69 persons		3.1%	

Sources: Bureau of the Census, 2006-2010; American Community Survey, 2014-2018.

Household size is an important market characteristic. Housing demand is shaped by the composition of its household sizes. The small household (one to two persons per household) traditionally prefers units with zero to two bedrooms, while the large household (five or more persons per household) prefers units with at least three bedrooms. Information on Table 7 shows that approximately 18% of Escondido households included five or more persons.

Table 7: Household Size (2018)

Persons	Owner HHs	Percent	Renter-HHs	Percent	Total HHs	Percent
One	3,963	16.9%	5,361	23.4%	9,324	20.1%
Two	8,210	35.0%	5,375	23.5%	13,585	29.3%
Three	4,070	17.4%	3,736	16.3%	7,806	16.8%
Four	3,684	15.7%	3,507	15.3%	7,191	15.5%
Five	1,955	8.3%	3,014	13.2%	4,969	10.7%
Six	850	3.6%	1,125	4.9%	1,975	4.3%
Seven or more	694	3.0%	794	3.5%	1,488	3.2%
Total	23,426	100.0%	22,912	100.0%	46,338	100.0%

HHs = Households

Source: Bureau of the Census, American Community Survey 2014-2018.

Household Income

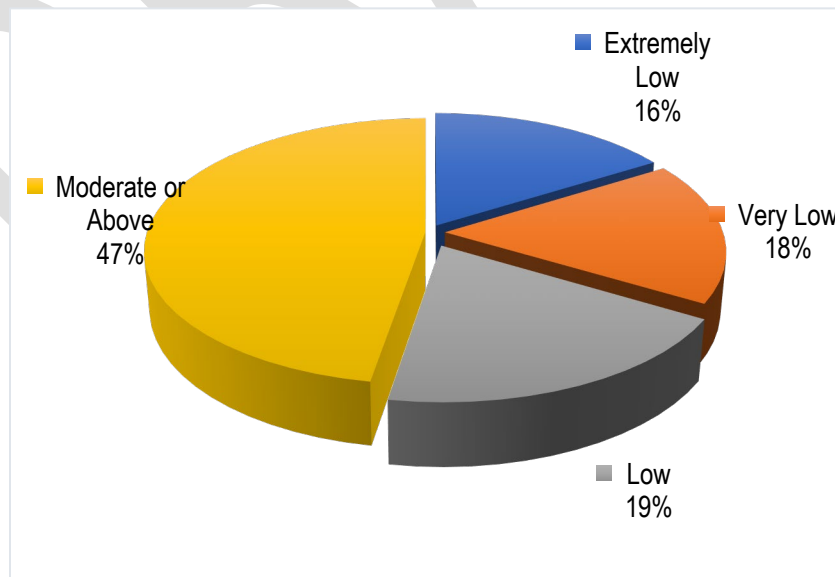
Household income is directly connected by the ability to afford housing. Income levels influence the range of housing prices within a region and the ability of the population to afford housing. Home ownership rates rise as household income increases. As household income decreases, households tend to pay a disproportionate amount of their income for housing and the number of persons occupying unsound and overcrowded housing increases.

For planning and funding purposes, the California State Department of Housing and Community Development (HCD) has developed the following income categories based on the Area Median Income (AMI) of a metropolitan area (such as San Diego County):

- Extremely Low: Households earning up to 30% of the AMI
- Very Low: Households earning between 31 – 50% of the AMI
- Low: Households earning between 51 – 80% of the AMI
- Moderate: Households earning between 81 - 120% of the AMI
- Above Moderate: Households earning over 120% of the AMI

Combined, the extremely low, very low, and low income groups are referred to as lower income. Federal programs provide assistance primarily to households in the lower Income category (up to 80% AMI). In 2017, approximately 47% of Escondido households earned moderate or above moderate incomes (Figure 2), while 53% of households had incomes in the lower income levels.¹

FIGURE 2: HOUSEHOLDS BY INCOME CATEGORIES (2013-2017)

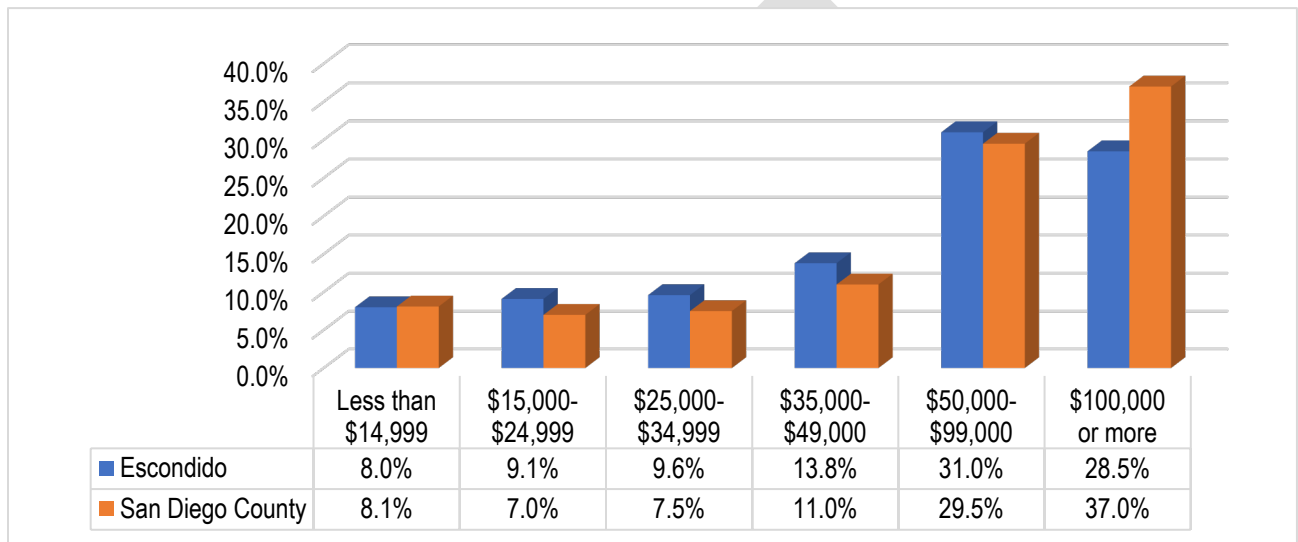


¹ Data was obtained from the Comprehensive Housing Affordability Strategy (CHAS) prepared for HUD by the Census Bureau using 2013-2017 Census data. CHAS data does not provide a breakdown of household income for those with more than 80% AMI as those households are not qualified for federal housing programs.



Household incomes in Escondido tend to be lower than those in the region as a whole. Median household income in the City was \$54,457 in 2009, compared to the San Diego County median household income of \$62,901. The ACS estimates the median household income in Escondido between 2014 and 2018 was \$62,319, compared to \$74,855 in the County. Figure 3 compares household income in Escondido and in the San Diego region between 2014 and 2018. Approximately 60% of Escondido households had incomes over \$49,999, seven percentage points lower than regionwide. Approximately 29% of Escondido households earned \$100,000 or more, compared to 37% in all of San Diego County. Approximately 27% of Escondido residents earned less than \$35,000 annually, compared to 23% region wide.

FIGURE 3: HOUSEHOLD INCOME DISTRIBUTION (2014-2018)



Median household income compared to neighboring communities provides a way to measure income in Escondido against other cities. Table 8 compares median income in Escondido to other North County cities and the region. Median household income in the City was one of the lowest in the region, comparable to the City of Vista.

Table 8: Median Household Income (2014-2018)

Jurisdiction	Median HH Income*	Percent Above/Below Regional Median
Carlsbad	\$107,172	43.2%
Encinitas	\$113,175	51.2%
Escondido	\$62,319	-16.7%
Oceanside	\$68,652	-8.3%
Poway	\$105,732	41.2%
San Marcos	\$76,619	2.4%
Vista	\$65,696	-12.2%
San Diego Region	\$74,855	----

Source: Bureau of the Census, American Community Survey, 2014-2018.



Median household income provides only partial insight into a community's income profile. A more detailed breakdown of households by income category can provide more information about the proportion of households in Escondido whose limited incomes may lead them to have a higher incidence of housing problems such as overpayment (paying more than 30% of income on housing) or overcrowding (having more than one person per room).

Household incomes improved from 2000 to 2010 (Table 9). The percentage of wage earners with annual incomes over \$50,000 increased, while the percentage of those earning less than \$50,000 decreased, though the majority of this increase was due to a 7.2% increase in residents earning \$100,000 or more. Since 2010, while the proportion of households earning over \$100,000 continued to increase, the proportions of households earning below \$15,000 decreased from 10% to eight percent, indicating a decrease in the number of households earning extremely low incomes.

Table 9: Income Distribution (2000-2018)

Household Income	Income Distribution			Percentage Change	
	2000	2010	2018	2000-2010	2010-2018
< \$10,000	3.8%	5.5%	4.9%	1.7%	-0.6%
\$10,000 - \$14,999	5.0%	5.0%	3.1%	0.0%	-1.9%
\$15,000 - \$24,999	11.8%	10.5%	9.1%	-1.3%	-1.4%
\$25,000 - \$34,999	14.3%	11.4%	9.6%	-2.9%	-1.8%
\$35,000 - \$49,999	16.5%	15.8%	13.8%	-0.7%	-2.0%
\$50,000 - \$74,999	22.2%	19.1%	18.1%	-3.1%	-1.0%
\$75,000 - \$99,999	12.3%	11.4%	12.9%	-0.9%	1.5%
\$100,000 or more	14.1%	21.3%	28.5%	7.2%	7.2%
Total	100.0%	100.0%	100.0%	--	--

Source: Bureau of the Census, 2000 Census; 2005-2009 American Community Survey 2005-2009; American Community Survey 2014-2018.

D. Housing Problems

The Comprehensive Housing Affordability Strategy (CHAS) developed by the Census for HUD provides detailed information on housing needs by income level for different types of households in Escondido. Detailed CHAS data based on the 2013-2017 American Community Survey is displayed in Table 10. Housing problems considered by CHAS include:

- Units with physical defects (lacking complete kitchen or bathroom);
- Overcrowded conditions (housing units with more than one person per room);
- Housing cost burden, including utilities, exceeding 30% of gross income; or
- Severe housing cost burden, including utilities, exceeding 50% of gross income.

The types of problems vary according to household income, type, and tenure. Some highlights include:

- In general, renter-households had a higher level of housing problems (66%) compared to owner-households (36%).



- Large renter-families had the highest level of housing problems regardless of income level (84%).
- Extremely low income (78%) and very low income households (85%) had the highest incidence of housing problems.

Table 10: Housing Assistance Needs of Lower Income Households (2017)

Household by Type, Income, and Housing Problem	Renters				Owners			Total Households
	Elderly	Small Families	Large Families	Total Renters	Elderly	Large Families	Total Owners	
Extremely Low Income (0-30% AMI)	1,085	2,335	720	5,465	910	55	1,835	7,300
% with any housing problem	75.1%	87.4%	97.9%	84.1%	65.9%	100.0%	60.5%	78.2%
% with cost burden >30%	74.2%	86.5%	96.5%	82.8%	66.5%	100.0%	60.8%	77.3%
% with cost burden > 50%	65.0%	72.6%	83.3%	71.0%	48.4%	100.0%	48.2%	65.3%
Very Low Income (31-50% AMI)	865	2,645	1,180	5,600	1,115	420	2,250	7,850
% with any housing problem	86.1%	95.7%	95.3%	93.4%	52.0%	88.1%	64.9%	85.2%
% with cost burden >30%	85.0%	90.2%	85.6%	88.5%	51.6%	59.5%	59.1%	80.1%
% with cost burden >50%	42.2%	39.5%	33.1%	40.0%	30.0%	21.4%	37.8%	39.4%
Low Income (51-80% AMI)	685	2,220	1,195	5,170	1,420	635	3,495	8,665
% with any housing problem	78.1%	68.5%	87.0%	72.8%	39.8%	70.1%	54.6%	65.5%
% with cost burden >30%	75.2%	53.8%	41.8%	55.3%	39.1%	55.9%	51.9%	54.0%
% with cost burden > 50%	24.1%	7.2%	7.9%	9.5%	16.2%	13.4%	19.9%	13.7%
Total Households	3,495	10,285	3,865	22,695	6,960	2,865	22,485	45,180
% with any housing problem	65.5%	65.5%	83.8%	66.0%	34.9%	59.3%	35.7%	50.9%

Note: Data presented in this table are based on special tabulations from sample Census data. The number of households in each category usually deviates slightly from the 100% total due to the need to extrapolate sample data out to total households. Interpretations of these data should focus on the proportion of households in need of assistance rather than on precise numbers.

Source: HUD Comprehensive Housing Affordability Strategy (CHAS), 2013-2017.

Overcrowding

Overcrowding is typically defined as a housing unit occupied by more than one person per room. A severely overcrowded household is defined as one with more than 1.5 persons per room. Under State law a housing unit is considered overcrowded if there is less than 120 square feet of livable space (all space except the bath, kitchen and hallways) for the first two people and less than an additional 50 square feet for each additional person. Overcrowding can indicate that a community does not have an adequate supply of affordable housing, especially for large families.

Overcrowding typically occurs when there are not enough adequately sized units within a community, when high housing costs relative to income force too many individuals to share a housing unit than it can adequately accommodate, or when families reside in smaller units than they need to devote income to other necessities, such as food and health care. Overcrowding tends to accelerate the deterioration



of housing. Therefore, maintaining a reasonable level of occupancy and alleviating overcrowding are critical to enhancing quality of life.

Table 11 shows that nearly 10% of the households in Escondido were overcrowded in 2010, inclusive of the 12% that were severely overcrowded. Overcrowding was more prevalent among renter-households than owner-households, as rental units are typically smaller in size and renter-households typically have lower incomes. The situation with overcrowding worsened significantly between 2010 and 2018, with over 12% of the City's households being overcrowded. Specifically, over 4% of the households were severely overcrowded. The prevalence of overcrowding among owner-households did not change significantly between 2010 and 2018. However, the prevalence of renter-households increased from 16% to 20% and severely overcrowded renter-households increased nearly three percent to 7.5% between 2014 and 2018.

Table 11: Overcrowded Housing Units (2010-2018)

Overcrowding	Owner-Households		Renter-Households		Total Households	
	Number	% of Owners	Number	% of Renters	Number	% of Total
2010						
Total Overcrowded (More than 1.0 persons/room)	1,073	4.4%	3,236	15.9%	4,309	9.7%
Severely Overcrowded (More than 1.5 persons/room)	324	1.0%	841	4.1%	1,075	2.4%
2018						
Total Overcrowded (More than 1.0 persons/room)	1,263	5.4%	4,475	19.5%	5,738	12.4%
Severely Overcrowded (More than 1.5 persons/room)	285	1.2%	1,725	7.5%	2,010	4.3%

Source: Bureau of the Census, 2006-2010; American Community Survey, 2014-2018.

Cost Burden

Measuring the portion of a household's gross income that is spent for housing is an indicator of the dynamics of demand and supply. This measurement is often expressed in terms of "cost burden:" households paying an excessive amount of their income for housing, therefore decreasing the amount of disposable income available for other needs. This indicator is an important measurement of local housing market conditions as it reflects the affordability of housing in the community. Federal and state agencies use cost burden indicators to determine the extent and level of funding and support that should be allocated to a community.

Table 12 shows that in 2017, 41% of households in the San Diego region were paying over 30% of their income towards housing costs. In Escondido, nearly 45% of all households were cost burdened. Renters were more likely to experience cost burden than owners; in Escondido 58% of renters were cost burdened, compared to 32% of owners. Escondido had the highest level of cost burdened renters while Encinitas had the lowest level. For owner-households, Vista had the highest level of cost burden and Carlsbad had the lowest level.



Table 12: Household Cost Burden (2017)

	All HH		Renters		Owners	
	Total	% Paying 30%+	Total	% Paying 30%+	Total	% Paying 30%+
Carlsbad	43,280	34.6%	15,130	46.1%	28,150	28.4%
Encinitas	24,285	35.5%	8,790	45.6%	15,495	29.8%
Escondido	45,175	44.8%	22,685	57.5%	22,490	31.9%
Oceanside	61,980	42.2%	27,290	55.1%	34,685	32.0%
Poway	15,770	33.9%	4,035	48.3%	11,735	28.9%
San Marcos	29,175	40.9%	11,285	53.6%	17,885	32.8%
Vista	30,570	44.7%	15,530	55.5%	15,040	33.6%
San Diego Region	1,111,740	41.3%	522,595	52.0%	589,145	31.7%

Note: Households do not equal total presented in other tables because housing costs were not computed for all households.
 Source: HUD Comprehensive Housing Affordability Strategy (CHAS), 2013-2017.

Table 13 provides more details on cost burden by income group for Escondido. Approximately 70% of lower income households were cost burdened versus 17% of moderate and above moderate households.

Table 13: Cost Burden by Tenure and Income Level (2017)

Household Income Group	Total Renters	Total Owners	Total
Extremely Low (<=30% AMI)	3,552	1,184	4,736
Cost Burden >30%	3,012	919	3,931
% Cost Burden >30%	84.8%	77.6%	83.0%
Very Low (>30% to <=50% AMI)	4,298	1,705	6,003
Cost Burden >30%	3,451	1,023	4,478
% Cost Burden >30%	80.3%	60.0%	74.6%
Low (>50% to <=80% AMI)	5,077	3,782	8,859
Cost Burden >30%	2,193	1,728	3,925
% Cost Burden >30%	43.2%	45.7%	44.3%
Moderate & Above (>80% AMI)	7,479	16,670	24,149
Cost Burden >30%	524	3,134	3,671
% Cost Burden >30%	7.0%	18.8%	15.2%
Total	20,406	23,341	43,747
Cost Burden >30%	9,183	6,816	15,968
% Cost Burden >30%	45.0%	29.2%	36.5%

Note: Totals may not be exact due to rounding; the Census Bureau uses a special rounding scheme for special tabulations such as these; totals may not match other census datasets
 Source: HUD Comprehensive Housing Affordability Strategy (CHAS), 2013-2017



E. Special Needs Groups

Certain segments of the population may have more difficulty in finding decent, affordable housing due to their special needs. Special circumstances may be related to one’s employment and income, family characteristics, disability and household characteristics, among other factors. Consequently, certain residents in Escondido may experience higher incidences of housing cost burden, overcrowding, or other housing problems.

The special needs groups analyzed include the elderly, people with disabilities (including persons with developmental disabilities), homeless people, single parents, large households, military personnel, farm workers, and students (Table 14). Many of these groups overlap, for example many farm workers may be homeless, and many elderly people have a disability of some type.

The majority of these special needs groups would be assisted by an increase in affordable housing, especially housing located near public transportation and services. Table 15 provides a list of services and facilities available to assist households/persons with special needs.

Special Needs Group	# of People or HHs	# Owners	% Owner	# Renters	% Renter	% of Total HHs or Population
Households with Seniors	11,169	--	--	--	--	24.1%
Senior Headed Households	9,915	6,919	29.5%	2,996	13.1%	21.4%
Seniors Living Alone	4,255	2,201	9.4%	2,054	9.0%	9.2%
Persons with Disabilities	15,626	--	--	--	--	10.3%
Large Households	8,432	3,499	14.9%	4,933	21.5%	18.2%
Single-Parent Households	5,127	--	--	--	--	11.1%
Female-Headed Households	6,806	2,457	10.5%	4,349	19.0%	14.7%
Female-Headed Households with children	3,739	--	--	--	--	7.3%
People Living in Poverty	22,270	--	--	--	--	14.7%
Farmworkers ¹	1,707	--	--	--	--	1.1%
Homeless	429	--	--	--	--	0.3%

1. ACS category includes "Agriculture, forestry, fishing and hunting, and mining."
 Source: Bureau of the Census, American Community Survey, 2014-2018; Regional Housing Task Force on the Homeless 2020.



Table 15: Inventory of Services for Special Needs Populations

Services	Program	Details
Emergency Shelters, Permanent, & Transitional Housing	Hidden Valley House	Provides temporary, emergency shelter for survivors of domestic violence and their children. Offers safety planning, crisis counseling, advocacy services and assistance with obtaining long-term safe housing.
	Inland Service Center/ Interfaith Community Services	Haven House Year-Round Shelter provides emergency housing for up to 49 homeless men and women each night. Also offers temporary beds for veterans with or without a housing intervention already in place to assist in their transition from homelessness to permanent housing. Interfaith offers a variety of permanent housing units and programs that provide safe and affordable housing for homeless community members.
	Serenity Village	Transitional Housing for women and women with children.
	Tikkun House	Provides temporary emergency shelter for homeless mentally or emotionally disturbed women. Case planning, counseling, and advocacy are offered.
	Interfaith Community Services	Resources to find affordable housing, transition housing, emergency shelter
	Las Casitas Community Housing	Housing education and workshops, low-income housing lists, homebuyer loans and foreclosure prevention.
	Veterans	Aster
Aster Apartments		28 beds
Fairweather Lodge		6 mentally ill veterans (permanent supportive housing)
Merle's Place		44 beds (dormitory)
New Resolve		44 beds (homeless, veterans)
Raymond's Refuge I & II		6 beds each for homeless seniors/ disabled (permanent supportive housing)
Veterans Villas		PSH & affordable units owned by VVSD on S Escondido Blvd. (total 54 units in development)
Senior/Disability Services	Joslyn Center	Senior support

Source: City of Escondido



Seniors

Many senior-headed households have special needs due to their relatively low incomes, disabilities or limitations, and dependency needs. Specifically, people aged 65 years and older often have four main concerns:

- Housing: Many seniors live alone and may have difficulty maintaining their homes.
- Income: People aged 65 and over are usually retired and living on a limited income.
- Health care: Seniors are more likely to have high health care costs.
- Transportation: Many of the elderly rely on public transportation; especially those with disabilities.

The limited income of many elderly persons often makes it difficult for them to find affordable housing. In the San Diego region, the elderly spend a higher percentage of their income for food, housing, medical care, and personal care than non-elderly families. Many elderly households need smaller “efficiency” units to make independent living possible and many single elderly persons need some form of housing assistance.

Table 16 shows that 17,632 persons were age 65 and older in Escondido in 2018. This accounted for about 12% of residents, comparable to the percentage found in the region as a whole. In comparison, most surrounding communities had higher proportions of seniors. Among the City’s senior population, 9,915 seniors were heads of households, representing about 21% of the City’s overall households (Table 14). Specifically, 4,255 senior-headed households were seniors living alone.

Jurisdiction	Total	Age 65+	Percent Age 65+
Carlsbad	113,670	19,151	16.8%
Encinitas	62,713	11,124	17.7%
Escondido	151,115	17,632	11.6%
Oceanside	175,389	27,214	15.5%
Poway	49,842	8,123	16.3%
San Marcos	94,709	11,057	11.7%
Vista	100,108	9,676	9.7%
San Diego Region	3,302,833	439,595	13.3%

Source: American Community Survey, 2014-2018.

Table 17 shows elderly households by tenure and income level in 2017. About the same proportion of elderly renter-occupied households and renter-occupied households (65.5% and 66%, respectively) experience a housing problem. Housing problems are defined as cost burden greater than 30% of income, and/or overcrowding, and/or without complete kitchen or plumbing facilities. Additionally, 64% of elderly renter-occupied households were paying more than 30% of their income for housing compared with 58% of all renter-households. Elderly owner-occupied households, on the other hand, tend to be better off than all households as a group (51%) but only marginally better than all owner-



occupied households. About 35% elderly owner-occupied households had any housing problem compared with 36% of all owner-occupied households. It appears that elderly owner-renter households are disproportionately affected by cost burden since about 36% are cost-burdened compared to 31% of all owner-occupied households. Also, while most elderly owner-households no longer hold a mortgage, some elderly homeowners may not be able to afford the costs of maintenance and repairs.

Table 17: Elderly Households by Tenure and Income Level (2017)

Household by Type, Income and Housing Problem	Renters		Owners		Total Households
	Elderly Renters	Total Renters	Elderly Owners	Total Owners	
Household Income <=30% AMI	1,085	5,465	910	1,835	7,300
% with any housing problems	75.1%	84.1%	65.9%	60.5%	78.2%
% Cost Burden >30%	74.2%	82.8%	66.5%	60.8%	77.3%
% Cost Burden >50%	65.0%	71.0%	48.4%	48.2%	65.3%
Household Income >30 to <=50% AMI	865	5,600	1,115	2,250	7,850
% with any housing problems	86.1%	93.4%	52.0%	64.9%	85.2%
% Cost Burden >30%	85.0%	88.5%	51.6%	59.1%	80.1%
% Cost Burden >50%	42.2%	40.0%	30.0%	37.8%	39.4%
Household Income >50 to <=80% AMI	685	5,170	1,420	3,495	8,665
% with any housing problems	78.1%	72.8%	39.8%	54.6%	65.5%
% Cost Burden >30%	75.2%	55.3%	39.1%	51.9%	54.0%
% Cost Burden >50%	24.1%	9.5%	16.2%	19.9%	13.7%
Household Income >80% AMI	860	6,460	3,515	14,905	21,365
% with any housing problems	22.7%	21.6%	19.5%	23.8%	23.1%
% Cost Burden >30%	19.8%	11.1%	19.2%	19.6%	17.0%
% Cost Burden >50%	5.8%	1.0%	2.8%	1.8%	1.6%
Total Households	3,495	22,695	6,960	22,485	45,180
% with any housing problems	65.5%	66.0%	34.9%	35.7%	50.9%
% Cost Burden >30	63.7%	57.5%	34.6%	31.9%	44.8%
% Cost Burden >50	36.8%	29.4%	15.9%	12.0%	20.7%

Notes:
 Any housing problems: cost burden greater than 30% of income and/or overcrowding and/or without complete kitchen or plumbing facilities. Other housing problems: overcrowding (1.01 or more persons per room) and/or without complete kitchen or plumbing facilities.
 Elderly households: 1 or 2 person household, either person 62 years old or older.
 Source: HUD Comprehensive Housing Affordability Strategy (CHAS), 2013-2017.



Persons with Disabilities

In Escondido and elsewhere, persons with disabilities have a wide range of housing needs, which vary depending on the type and severity of the disability as well as personal preference and lifestyle. Physical, mental, and/or developmental disabilities may prevent a person from working, restrict one's mobility, or make it difficult to care for oneself. "Barrier-free design" housing, accessibility modifications, proximity to services and transit, and group living opportunities represent some of the types of considerations and accommodations that are important in serving this group. Also, some residents suffer from disabilities that require living in a supportive or institutional setting.

According to 2014-2018 ACS data, approximately 10% of Escondido residents had a disability. The ACS also tallied the number of disabilities by type for residents with one or more disabilities. Among the disabilities tallied, cognitive, ambulatory, and independent living difficulties were almost equally prevalent (Table 18).

Disability Type	Under 18	Age 18 to 64	Age 65+	Total
With a hearing difficulty	8.8%	8.6%	17.0%	12.6%
With a vision difficulty	9.3%	8.5%	7.6%	8.2%
With a cognitive difficulty	54.9%	23.2%	13.1%	20.1%
With an ambulatory difficulty	8.8%	26.4%	28.7%	26.5%
With a self-care difficulty	18.2%	10.5%	11.1%	11.2%
With an independent living difficulty	0.0%	22.8%	22.4%	21.4%
Total Disabled Persons	1,724	14,811	14,879	31,414

Note: A person can have multiple disabilities.
 Source: American Community Survey, 2014-2018.

Four factors – affordability, design, location, and discrimination – significantly limit the supply of housing available to households of persons with disabilities. The most obvious housing need for persons with disabilities is housing that is adapted to their needs. Most single-family homes are inaccessible to people with mobility and sensory limitations. Housing may not be adaptable to widened doorways and hallways, access ramps, larger bathrooms, lowered countertops, and other features necessary for accessibility.

Location of housing is also an important factor for many persons with disabilities, as they often rely upon public transportation to travel to necessary services and shops. "Barrier free design" housing, accessibility modifications, proximity to services and transit, and group living opportunities are important in serving this group. Incorporating barrier-free design in all new multi-family housing is especially important to provide the widest range of choices for the disabled.

Housing advocacy groups report that people with disabilities are often the victims of discrimination in the home buying market. People with disabilities, whether they work or receive disability income are often perceived to be a greater financial risk than persons without disabilities with identical income amounts. The 2014-2018 ACS reported that 19% of persons with disabilities in Escondido were living

below the poverty level. It also estimated that 73% of people with disabilities between the ages of 16 and 64 years in the City were not in the labor force.

A change in State law requires that the Housing Element discuss the housing needs of persons with developmental disabilities. As defined by federal law, "developmental disability" means a severe, chronic disability of an individual that:

- Is attributable to a mental or physical impairment or combination of mental and physical impairments;
- Is manifested before the individual attains age 18;
- Is likely to continue indefinitely;
- Results in substantial functional limitations in three or more of the following areas of major life activity: self-care; receptive and expressive language; learning; mobility; self-direction; capacity for independent living; or economic self-sufficiency;
- Reflects the individual's need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated.

The Census does not record developmental disabilities. According to the U.S. Administration on Developmental Disabilities, an accepted estimate of the percentage of the population that can be defined as developmentally disabled is 1.5%. This equates to 2,295 persons in the City of Escondido with developmental disabilities based on the 2020 California Department of Finance population estimates.

The San Diego Regional Center, which provides services for persons with developmental disabilities, publishes client statistics for its four area offices. The City of Escondido is served by the North County office in San Marcos. As of June 2019, 1,672 residents Escondido residents had received services from the Regional Center.

Many developmentally disabled persons can live and work independently within a conventional housing environment. More severely disabled individuals require a group living environment where supervision is provided. The most severely affected individuals may require an institutional environment where medical attention and physical therapy are provided. Because developmental disabilities exist before adulthood, the first issue in supportive housing for the developmentally disabled is the transition from the person's living situation as a child to an appropriate level of independence as an adult.

Large Households

Large households are defined as those consisting of five or more members. These households comprise a special need group because of the limited supply of adequately sized and affordable housing units in a community. To save for other basic necessities such as food, clothing and medical care, it is common for lower income large households to reside in smaller units, which frequently results in overcrowding and can accelerate the deterioration of housing.

The City had 8,111 large households in 2000, comprising about 19% of the City's total households. The proportion increased to 21% by the following decade. The 2010 Census data indicated that there were



9,410 households with five or more members. By 2018, the number of large households decreased to 8,432, or 18% of all households in the City. Table 19 compares the number of large households in Escondido to that in the region as a whole. In 2018, 18% of households in Escondido consisted of five or more persons, compared to 12% region wide. Renter-households represented the majority (59%) of all large households.

Table 19: Large Households (2018)				
Jurisdiction	Persons in Household			Total Households
	5	6	7+	
Escondido	4,969	1,975	1,488	8,432
Percent of Total	10.7%	4.3%	3.2%	18.2%
San Diego Region	78,930	32,607	21,051	132,588
Percent of Total	7.1%	2.9%	1.9%	11.8%
Source: Bureau of the Census, 2014-2018 American Community Survey.				

As shown in Table 20, a greater percentage of larger households had housing problems than all households (51%) in 2017. Housing problems can be defined as cost burden greater than 30% of income, and/or overcrowding, and/or without complete kitchen or plumbing facilities. Renter-occupied large households (as a group) tend to have more housing problems than owner-occupied large households. The majority of renter-occupied large households (84%) had one or more housing problems, while more than half of larger owner-occupied households (59%) had one or more housing problems.



Table 20: Large Households by Tenure and Income Level (2017)

Household by Type, Income, & Housing Problem	Renters		Owners		Total Households
	Large Related (5 or more members)	Total Renters	Large Related (5 or more members)	Total Owners	
Household Income <=30% AMI	720	5,465	55	1,835	7,300
% with any housing problems	97.9%	84.1%	100.0%	60.5%	78.2%
% Cost Burden >30%	96.5%	82.8%	100.0%	60.8%	77.3%
% Cost Burden >50%	83.3%	71.0%	100.0%	48.2%	65.3%
Household Income >30 to <=50% AMI	1,180	5,600	420	2,250	7,850
% with any housing problems	95.3%	93.4%	88.1%	64.9%	85.2%
% Cost Burden >30%	85.6%	88.5%	59.5%	59.1%	80.1%
% Cost Burden >50%	33.1%	40.0%	21.4%	37.8%	39.4%
Household Income >50 to <=80% AMI	1,195	5,170	635	3,495	8,665
% with any housing problems	87.0%	72.8%	70.1%	54.6%	65.5%
% Cost Burden >30%	41.8%	55.3%	55.9%	51.9%	54.0%
% Cost Burden >50%	7.9%	9.5%	13.4%	19.9%	13.7%
Household Income >80% AMI	770	6,460	1,755	14,905	21,365
% with any housing problems	48.1%	21.6%	47.3%	23.8%	23.1%
% Cost Burden >30%	6.5%	11.1%	18.2%	19.6%	17.0%
% Cost Burden >50%	0.0%	1.0%	2.6%	1.8%	1.6%
Total Households	3,865	22,695	2,865	22,485	45,180
% with any housing problems	83.8%	66.0%	59.3%	35.7%	50.9%
% Cost Burden >30%	58.3%	57.5%	34.2%	31.9%	44.8%
% Cost Burden >50%	28.1%	29.4%	9.6%	12.0%	20.7%

Note: Totals may not match other 2014-2018 ACS products due to rounding.
 Any housing problems: cost burden greater than 30% of income and/or overcrowding and/or without complete kitchen or plumbing facilities.
 Source: HUD Comprehensive Housing Affordability Strategy (CHAS), 2013-2017.



Single Parent Households

Single-parent families, particularly female-headed families with children, often require special consideration and assistance because of their greater need for affordable housing and accessible day care, health care, and other supportive services. Female-headed families with children are considered a vulnerable group because they must balance the needs of their children with work responsibilities, often while earning limited incomes.

Table 21 shows that in 2018, Escondido had 5,127 single-parent households (11% of all households). Of these, the majority (66%) were female-headed households. In comparison, about eight percent of all County households were single-parent households, but 72% of these households were female-headed households.

	Total HHs	Single Parent HHs	Percent Total HHs	Female Headed HHs	Percent Single Parent HHs	Below Poverty	
						Female Headed HHs	Percent Female Headed HHs
Escondido	46,338	5,127	11.1%	3,379	65.9%	1,454	43.0%
San Diego Region	1,118,980	92,411	8.3%	66,423	71.9%	22,186	33.4%

HHs = Households
 Source: American Community Survey, 2014-2018.

Residents Living Below Poverty

Female-headed families are particularly affected by poverty disproportionately. In 2010, 21% of the City's total residents (29,055 persons) were living in poverty. Approximately 34% of female-headed households with children, however, had incomes below the poverty level. In comparison, the 2014-2018 ACS reports that the percent of the city's population living below the poverty level decreased to 15% while percent of female-headed families increased by nine percent to 43%.

Extremely Low-Income Households

Extremely low-income (ELI) is defined as households with income less than 30% of area median income. The area median income in the County is \$92,700. For ELI households, this results in an income of \$31,200 or less for a four-person household or \$24,300 or less for a one-person household (See Table 34). ELI households have a variety of housing situations and needs. For example, most families and individuals receiving public assistance, such as social security insurance (SSI) or disability insurance are considered ELI households.

According to the most recent data from HUD, approximately 7,300 ELI households resided in the City, representing 16% of the total households. Most (78%) ELI households experience a high incidence of housing problems (defined as cost burden greater than 30% of income and/or overcrowding and/or without complete kitchen or plumbing facilities). Most (75%) ELI households are also renters, and renter ELI households experience housing problems at higher rates than



owner ELI households (84% versus 61%, respectively). Elderly households make up almost one third (1,995) of all ELI households. In addition, over 60% of ELI households have a member with a disability.

Table 22: Extremely-Low-Income Households by Tenure and Type

	Renters				Owners				All ELI HH
	Elderly	Small Related	Large Related	Total Renters	Elderly	Small Related	Large Related	Total Owners	
ELI Households	1,085	2,335	720	5,465	910	550	55	1,835	7,300
% with Any Housing Problem	75.1%	87.4%	97.9%	84.1%	65.9%	39.1%	100.0%	60.5%	78.2%
% with Cost Burden >30	74.2%	86.5%	96.5%	82.8%	66.5%	40.0%	100.0%	60.8%	77.3%
% with Cost Burden >50	65.0%	72.6%	83.3%	71.0%	48.4%	33.6%	100.0%	48.2%	65.3%
With Disability	N/A	N/A	N/A	3,335	N/A	N/A	N/A	1,210	4,545
% with Disability	N/A	N/A	N/A	61.0%	N/A	N/A	N/A	65.9%	62.2%
Total HH	3,495	10,285	3,865	22,695	6,960	10,535	2,865	22,485	45,180
% of HH ELI	31.0%	22.7%	18.6%	24.1%	13.1%	5.2%	1.9%	8.2%	16.2%

Source: HUD CHAS 2013-2017 ACS Estimates

ELI households will likely seek rental housing and housing that is accessible to elderly residents and/or residents with disabilities. To address the range of needs, the City will promote a variety of housing types by locating ELI housing across the City (in the Downtown, East Valley, and South Centre planning areas), along with other transit-supportive uses and improvements. In addition, the City will facilitate and encourage low-income housing through the following Programs:

- ADUs: Explore tools and incentives to facilitate ADU construction, including on religious properties.
- Supportive Housing: Review and amend their Municipal Code to ensure supportive housing is allowed where residential uses are allowed.
- Affordable Housing Finance Programs: Support the construction, acquisition/rehabilitation, and preservation of affordable housing in the community, especially for ELI and special needs households.

In addition, the City has a variety of programs that support existing ELI households:

- Essential Middle Income Rental Housing Program: Acquisition and conversion of existing market-rate apartment communities to rent-restricted units for Low-Income, Median-Income, and Moderate-Income households earning no more than 120% of AMI.
- Mobile Home Park Rent Review: Conduct hearings on rent increases.
- Preservation of at-risk units.

Homeless

Throughout the San Diego region and country, homelessness has become an increasingly important issue. Factors contributing to the rise in homelessness include a lack of housing affordable to low and

moderate income persons, increases in the number of persons whose incomes fall below the poverty level, reductions in public subsidies to the poor, and the de-institutionalization of the mentally ill.

State law (Section 65583(1) (6)) mandates that municipalities address the special needs of homeless persons within their jurisdictional boundaries. "Homelessness" as defined by the U.S. Department of Housing and Urban Development (HUD), describes an individual (not imprisoned or otherwise detained) who:

- Lacks a fixed, regular, and adequate nighttime residence; and
- Has a primary nighttime residence that is:
 - A supervised publicly or privately operated shelter designed to provide temporary living accommodations (including welfare hotels, congregate shelters, and transitional housing for the mentally ill);
 - An institution that provides a temporary residence for individuals intended to be institutionalized; or
 - A public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings.

This definition does not include persons living in substandard housing, (unless it has been officially condemned); persons living in overcrowded housing (for example, doubled up with others), persons being discharged from mental health facilities (unless the person was homeless when entering and is considered to be homeless at discharge), or persons who may be at risk of homelessness (for example, living temporarily with family or friends.)

The Regional Task Force on the Homeless ("RTFH") is San Diego County's leading resource for information on issues of homelessness. Established in 1985, the Task Force promotes a regional approach as the best solution to ending homelessness in San Diego County. The Task Force is a public/private effort to build a base of understanding about the multiple causes and conditions of homelessness.

According to the Task Force, the San Diego region's homeless population can be divided into two general groups: (1) urban homeless, and (2) rural homeless, including farm workers and day laborers who primarily occupy the hillsides, canyons and fields of the northern regions of the county. It is important to recognize that homeless individuals may fall into more than one category (for example, a homeless individual may be a veteran and a substance abuser), making it difficult to accurately quantify and categorize the homeless.

Since the homeless population is very difficult to quantify, Census information on homeless populations is often unreliable, due to the difficulty of efficiently counting a population without permanent residences. The Task Force compiles data from a physical Point-In-Time ("PIT") count of sheltered (emergency and transitional) and street homeless persons. The 2020 Count was conducted on January 22, 2020 and the results are shown in Table 23. Oceanside and Escondido had the largest homeless populations of the North County cities.



Table 23: Homelessness in North County Cities (2020)

Jurisdiction	Sheltered	Unsheltered	Total
Carlsbad	53	94	147
Escondido	165	264	429
Encinitas	33	47	80
Oceanside	166	242	408
Poway	0	15	15
San Marcos	0	8	8
Vista	49	51	100
San Diego Region	3,648	3,971	7,619

Source: Regional Housing Task Force on the Homeless (2020).

Military Personnel

The military population’s influence on the demand for housing takes two forms: (a) the existing service households trying to find housing; and (b) the former (either retirement or non-retirement separations) service households trying to find housing. The San Diego region is home to a disproportionate share of the State's and the nation's military personnel. According to the one-year 2018-2019 ACS, 54% of California’s 150,746 uniformed military personnel were stationed in the San Diego region, and seven percent of the nation’s 1.2 million armed forces were located in the region.

The greatest concentration of military personnel to the overall labor force in the region is found in Coronado, home to Naval Air Station North Island. Almost one out of every two members of Coronado’s total labor force is in the military. Other areas with relatively high concentrations of military personnel are the City of National City and the unincorporated area. However, the City of San Diego has the largest number of people in the armed forces (32,617), accounting for about 40% of the region’s enlisted military personnel. The existing military family housing is scattered across the region, and some communities, such as Escondido, have substantial portions of their housing stock occupied by military families. However, less than one percent of the region’s armed forces reside in Escondido.

Student Housing Need

Student housing is considered a factor that affects housing availability. Although students may produce only temporary housing need, the impact upon housing demand and post-study residence is critical in the immediate university areas. San Diego State University, the largest university in the region, has an enrollment of 33,870 students as of the Fall of 2020, but only provides housing for approximately 3,500 students on campus. The University of San Diego houses approximately 3,800 students on campus for a student enrollment of 8,861 (Fall 2020). The University of California at San Diego provides on-campus housing for about 11,000 students for a student enrollment of 37,629 (Fall 2019). Other smaller universities and junior colleges in the County create similar housing problems. For example, the location of California State University San Marcos has had some impact on local housing, due to its location a few miles west of Escondido.

Typically, students are low income and are, therefore, impacted by a lack of affordable housing, especially within easy commuting distance from campus. They often seek shared housing situations to decrease expenses, and can be assisted through roommate referral services offered on and off campus. The lack of affordable housing also influences choices students make after graduation which can have a detrimental effect on the region's economy. The recent graduates provide a specialized pool of skilled labor that is vital to the region; however, the lack of affordable housing often leads to their departure from the area.

Farm Workers

Farm workers are defined as those households whose wage earners make their living through seasonal agricultural work and who move with the seasons to different farming areas or communities. Permanent residents, who work in agriculture doing similar work, but who live in Escondido the entire year, are included in the City's estimates of households needing assistance due to affordability. However, the undocumented immigrant and migrant worker form a substantial part of the farm worker population. The ability to gather information about this segment of the farm worker population is limited because they are so mobile and reluctant to participate in any survey.

Due to the high cost of housing and low wages, a significant number of migrant farm workers have difficulty finding affordable, safe and sanitary housing. According to the State Employment Development Department, the average farm worker earned a mean annual wage of \$31,729.2 This limited income is exacerbated by their tenuous and/or seasonal employment status.

The housing needs of farm workers are difficult to quantify due to the fear of job loss and the fear of authority. Thus, farm workers are given low priority when addressing housing needs, and often receive the least hospitable housing. The San Diego County Regional Task Force on the Homeless estimates that many of the farm workers in the County live in migrant camps throughout the region.

The 2014-2018 ACS provided a few indicators of the potential farm worker population. The ACS revealed that approximately 1,308 individuals in Escondido were employed in the farming, fishing, and forestry industry. More recent estimates for the number of farm workers, however, vary depending upon the different growing seasons. The National Center for Farmworker Health ("NCFH") estimates that there are over 12,000 hired farm workers and nearly 2,000 contract farm workers in San Diego County.³ The numbers can change quickly as more work becomes available. This population remains highly migratory, following the work as it becomes available and even returning home for short periods during the off season. Other estimates of farmworker population come from the U.S. Department of Agriculture (USDA). According to the USDA's 2017 Census of Agriculture, 2,202 persons were hired farm labor (full time), 7,982 persons were employed for 150 days or more, and 4,353 were hired for 150 days or less in San Diego County (data is only available at a county level).

² State Employment Development Department, Occupational Employment (May 2019) and Wage Data (1st Quarter, 2020).

³ National Center for Farmworker Health, Inc., Migratory and Seasonal Farmworker Population Estimates (2017).

The number of encampments located throughout the County has become very difficult to estimate because encampments move frequently and are now much smaller than in the past. It is estimated that there are between 100 and 150 farm worker camps located throughout the San Diego region, primarily in rural areas.⁴ These encampments range in size from a few people to a few hundred and are frequently found in fields, hillsides, canyons, ravines, and riverbeds, often on the edge of their employer's property. Some workers reside in severely overcrowded dwellings, in packing buildings, or in storage sheds. Because camps tend to be in remote locations, this population is often under-counted. Most farm workers and day laborers have moved from living inside the local jurisdictions boundary lines to just outside them in the unincorporated areas. The City of Escondido recognizes the needs of farm workers and allows housing to be partially provided through provisions in the Zoning Ordinance. The City is one of a few which allows, as a permitted use in agricultural and estate residential zones, living quarters for persons employed on the premises in conjunction with authorized agricultural uses.

The City completed the development of nine units for farm workers as part of a 24-unit affordable housing complex for low income households in 2001. The project is located at 1801-1821 South Escondido Boulevard and is called Eucalyptus View Cooperative Apartments. The development provides 24 units of affordable housing to families earning less than 50% of the area median income. The unit mix includes four one-bedroom units, 11 two-bedroom units and eight three-bedroom units. As a limited-equity cooperative, Eucalyptus View provides a form of homeownership. The initial share prices are equivalent to what is typically required for rent and security deposits for a rental unit. Long-term affordability is guaranteed and resale prices are limited to a percentage of annual increases in the equity investment.

F. Housing Stock Characteristics

A community's housing stock is defined as the collection of all housing units located within the jurisdiction. The characteristics of the housing stock, including growth, type, age and condition, tenure, vacancy rates, housing costs, and affordability are important in determining the housing needs for the community. This section details the housing stock characteristics of Escondido to identify how well the current housing stock meets the needs of current and future residents of the City.

Housing Growth

During the 1980s and 1990s, the City's housing stock grew significantly that led to the City implementing several growth management policies that dramatically limited the number of units that could be built each year in order to ensure the provision of adequate facilities and services prior to development of future housing stock. As a result, the rate of housing growth declined sharply between 2000 and 2010, at less than seven percent (Table 24). The decrease in housing production also occurred as a result of the recession. While there were building permits available to be pulled for units in some of the large subdivisions, developers chose not to build due to the decline in the market.

⁴ California Institute for Rural Studies. The Agricultural Worker Health Study, Case Study 2: North San Diego County (July 2002).



Recovery from the recession had been slow. While several neighboring jurisdictions experienced large increases in their housing stock over the last 20 years, such as Carlsbad and San Marcos, others jurisdictions, including Escondido, experienced only moderate increases. Table 24: shows that between 2010 to 2020, Escondido’s housing stock increased only 2.4%, below the countywide average (5.3%) and significantly below the nearby Carlsbad and San Marcos, where housing growth exceeded six percent and 13%, respectively.

Table 24: Housing Unit Growth (2000 to 2020)

Jurisdiction	2000	2010	2020	Percent Change	
				2000-2010	2010-2020
Carlsbad	33,812	44,673	47,629	32.1%	6.6%
Encinitas	23,829	25,740	26,625	8.0%	3.4%
Escondido	45,050	48,044	49,211	6.7%	2.4%
Oceanside	59,583	64,435	66,078	8.1%	2.6%
Poway	15,714	16,715	16,932	6.4%	1.3%
San Marcos	18,862	28,641	32,460	51.8%	13.3%
Vista	29,814	30,986	32,874	3.9%	6.1%
San Diego Region	1,040,149	1,164,786	1,226,879	12.0%	5.3%

Source: Bureau of the Census, 2000 and 2010 Censuses; California Department of Finance, 2020 Population and Housing Estimates.

Projected Housing Units

Table 25 shows that between 2020 and 2030, Escondido is projected to gain 12% in housing stock. Regionwide, approximately ten percent more units will be added to the housing stock. Between 2020 and 2040, Escondido is projected to see an increase of 13% in housing stock and approximately 17% more units will be added in the region.

Table 25: Projected Housing Units (2020-2040)

Jurisdiction	2020 (Actual)	2030	2040	Percent Change	
				2020-2030	2020-2040
Carlsbad	47,629	49,629	50,491	4.2%	6.0%
Encinitas	26,625	26,646	27,100	0.1%	1.8%
Escondido	49,211	55,322	55,826	12.4%	13.4%
Oceanside	66,078	69,506	70,612	5.2%	6.9%
Poway	16,932	17,406	17,714	2.8%	4.6%
San Marcos	32,460	35,758	37,401	10.2%	15.2%
Vista	32,874	34,028	37,280	3.5%	13.4%
San Diego Region	1,226,879	1,348,802	1,434,653	9.9%	16.9%

Source: California Department of Finance, 2020 Population and Housing Estimates & SANDAG Regionwide 2050 Forecast Series 13.



Housing Type

Figure 4 shows that in 2020, the largest percentage (51%) of housing units in Escondido was single-family detached units. Approximately six percent were single-family attached units, 36% were multi-family developments, and eight percent were mobile homes/trailers.

FIGURE 4: HOUSING TYPES (2020)

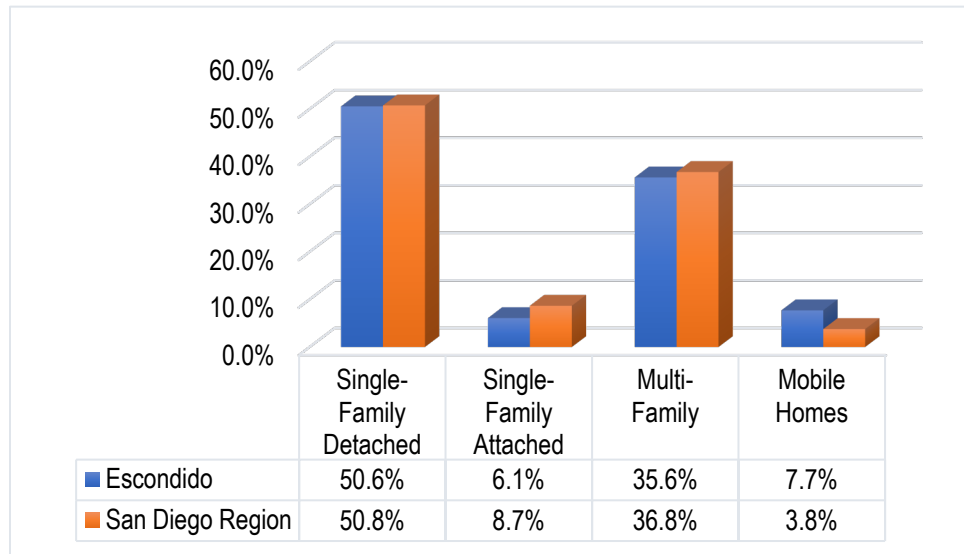


Table 26 shows that the proportion of both single-family units and mobile homes in Escondido is projected to decrease slightly, while the proportion of multi-family units is expected to increase. However, this figure may be misleading because SANDAG forecasts mobile homes by determining the region's mobile home growth rate and applying it to each jurisdiction.

Table 26: Projected Housing Unit by Type (2020-2040)

Housing Type	2020	% of Total	2030 (Projected)	% of Total	2040 (Projected)	% of Total
Single-Family	27,878	56.6%	28,474	51.5%	28,670	51.4%
Multi-Family	17,537	35.6%	23,109	41.8%	23,417	41.9%
Mobile Homes	3,796	7.7%	3,739	6.8%	3,739	6.7%
Total Housing	49,211	100.0%	55,322	100.0%	55,826	100.0%

Source: California Department of Finance, 2020 Population and Housing Estimates; SANDAG Regionwide Forecast 2050, Series 13.



Housing Availability and Tenure

Housing tenure and vacancy rates are important indicators of the supply and cost of housing. Housing tenure refers to whether a unit is owned or rented. Tenure is an important market characteristic because it is directly related to housing types and turnover rates. The tenure distribution of a community's housing stock can be an indicator of several aspects of the housing market, including the affordability of units, household stability and residential mobility among others. In most communities, tenure distribution generally correlates with household income, composition and age of the householder.

In 2010, among the City's occupied housing units, approximately 52% were owner-occupied, while 48% were renter-occupied (Table 27: Tenure of Occupied Housing Units (2010-2018)). According to the 2014-2018 ACS, the home ownership rate in Escondido decreased slightly to 51% of the occupied units. Renter-occupied housing units made up almost 49% of the City's occupied housing stock. Approximately four percent of total housing units were vacant.

Table 27: Tenure of Occupied Housing Units (2010-2018)

Tenure	2010 Census		2014-2018 ACS	
	Number	Percent	Number	Percent
Owner Occupied	23,759	52.2%	23,426	50.6%
Renter Occupied	21,725	47.8%	22,912	49.4%
Total	45,484	100.0%	46,338	100.0%

Sources: Bureau of the Census, 2010 Census; American Community Survey, 2014-2018.

Renter-occupied households had a slightly higher average household size than owners (Table 28). Approximately 54% of households with four or more persons were renter-households. In 2010, average renter-household size was 3.26 persons compared to 2.99 persons per for the average owner-household. In 2018, average renter-household size increased to 3.28 persons compared to 3.15 persons per for the average owner-household, narrowing the discrepancy in average household size based on tenure.

Table 28: Household Size by Tenure (2018)

	1-3 Persons		4+ Persons		Total	
	Number	Percent	Number	Percent	Number	Percent
Owner	16,243	52.9%	7,183	46.0%	23,426	50.6%
Renter	14,472	47.1%	8,440	54.0%	22,912	49.4%
Total	30,715	100.0%	15,623	100.0%	46,338	100.0%

Source: American Community Survey, 2014-2018.

Vacancy rates are an important housing indicator because they indicate the degree of choice available. High vacancy rates usually indicate low demand and/or high supply conditions in the housing market. Too high of a vacancy rate can be difficult for owners trying to sell or rent. Low vacancy rates usually



indicate high demand and/or low supply conditions in the housing market. Too low of a vacancy rate can force prices up making it more difficult for low and moderate income households to find housing.

Vacancy rates between two to three percent are usually considered healthy for single-family housing; and five to six percent for multi-family housing. However, vacancy rates are not the sole indicator of market conditions. They must be viewed in the context of all the characteristics of the local and regional market. According to the 2014-2018 ACS, the overall vacancy rate in Escondido was four percent. Specifically, ownership housing had a vacancy rate of one percent while the rental vacancy rate was 3.5%.

Additional vacancy information was obtained for Spring 2019 from the San Diego County Apartment Association ("SDCAA") and is shown in Table 29. Vacancy rates in Escondido were similar to those in the Northern San Diego County region.

Table 29: Vacancy Rates and Property Age (2019)

Jurisdiction	Combined Property Ages			Over 25 Years			6 to 25 Years			Less than 6 Years		
	% Vacant	Total Units	# Vacant	% Vacant	Total Units	# Vacant	% Vacant	Total Units	# Vacant	% Vacant	Total Units	# Vacant
Carlsbad	1.9%	526	10	1.9%	526	10	--	--	--	--	--	--
Del Mar	6.1%	246	15	7.4%	202	15	--	--	--	--	--	--
Encinitas	0.0%	10	0	0.0%	10	0	--	--	--	--	--	--
Escondido	3.9%	535	21	2.8%	250	7	5.0%	202	10	--	--	--
Oceanside	3.9%	487	19	3.2%	282	9	0.0%	4	0	--	--	--
Solana Beach	1.1%	176	2	1.1%	176	2	--	--	--	--	--	--
N. County Region	4.0%	3,730	148	3.5%	2,628	93	4.9%	206	10	0.0%	0	0
San Diego City	4.0%	9,544	378	3.6%	4,374	157	3.4%	1,944	66	11.1%	1,002	111
SD Region	4.1%	23,000	936	--	--	--	--	--	--	--	--	--

Source: San Diego County Apartment Association Survey, Spring 2019.

Housing Age and Condition

Housing age can be an important indicator of housing condition within a community. Like any other tangible asset, housing is subject to gradual physical or technological deterioration over time. If not properly and regularly maintained, housing can deteriorate and discourage reinvestment, depress neighboring property values, and eventually impact the quality of life in a neighborhood. Many federal and state programs also use the age of housing as one factor in determining housing rehabilitation needs. Typically, housing over 30 years of age is more likely to have rehabilitation needs that may include new plumbing, roof repairs, foundation work and other repairs. Although the Censuses did not include statistics on housing condition based upon observations, they did include statistics that correlate very closely with substandard housing.

The three factors most commonly used to determine housing conditions are age of housing, overcrowding, and lack of plumbing and kitchen facilities. Table 30 shows that in 2018 approximately



88% of the housing stock was more than 20 years old and 76% was over 30 years old. Table 31 provides estimates of substandard housing conditions in the City.

Table 30: Year Housing Built (2018)		
Year Built	Number	Percent
2014 or later	243	0.5%
2010-2013	672	1.4%
2000-2009	4,741	9.8%
1990-1999	6,045	12.5%
1980-1989	13,327	27.6%
1970-1979	12,433	25.8%
1960-1969	6,206	12.9%
1950-1959	2,872	6.0%
1940-1949	646	1.3%
1939 or earlier	1,083	2.2%
Total	48,268	100.0%

Source: American Community Survey, 2014-2018.

Table 31: Substandard Units (2018)		
	Number	Percentage
Lacking complete plumbing facilities	224	0.5%
Lacking complete kitchen facilities	387	0.8%
Total occupied substandard units	611	1.3%
Total occupied units:		46,338

Sources: American Community Survey, 2014-2018.

Housing that is not maintained can discourage reinvestment, depress neighboring property values, and can negatively impact the quality of life in a neighborhood. Improving housing is an important goal of the City. The age of the City's housing stock indicates a potential need for continued code enforcement, property maintenance and housing rehabilitation programs to stem housing deterioration.

Because substandard housing can cause serious health and safety issues, physical defects should not be used as the only indicator of substandard housing. The Housing Division considers housing units in compliance with local building codes to be standard units. Any housing unit that does not meet these requirements is considered substandard. Common housing code violations make a unit unsafe and/or unsanitary, including problems with electrical wiring, plumbing, windows, roofs and exterior, and heating and air conditioning systems. The City's Housing Rehabilitation program assists an average of 22 households annually given funding limitations and receives 5-10 calls per month seeking assistance for rehabilitation. The City estimates that in any given year, about 300 units may be considered substandard and requiring rehabilitation. Escondido's substandard units are all suitable for rehabilitation.



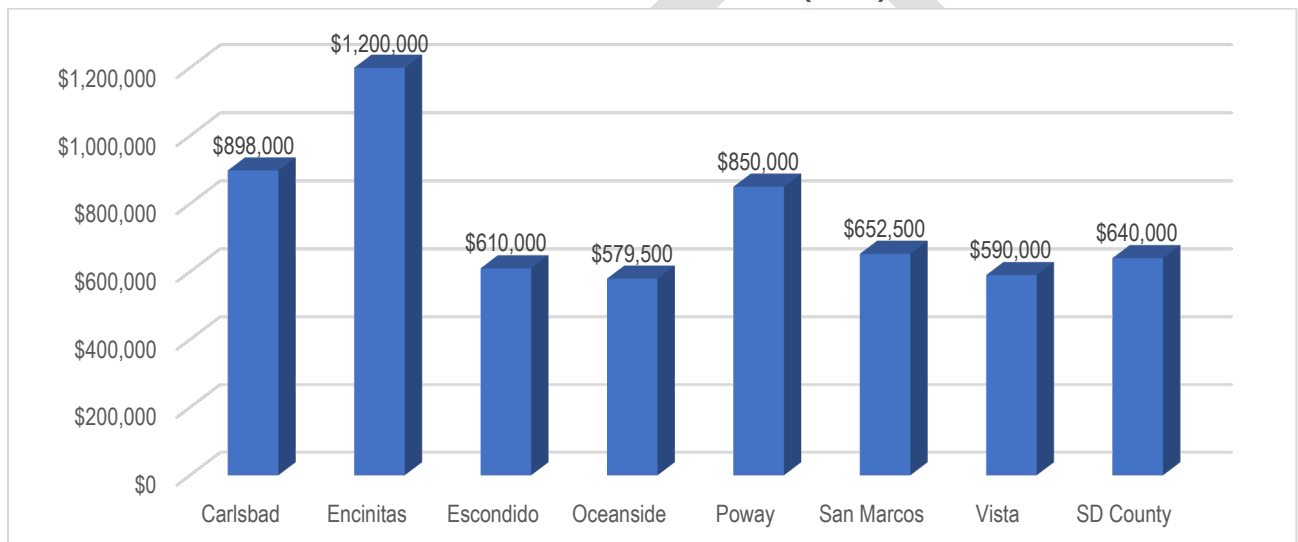
G. Housing Cost and Affordability

Housing costs are indicative of housing accessibility to all economic segments of the community. Typically, if housing supply exceeds housing demand, housing costs will fall. If housing demand exceeds housing supply, housing costs will rise. This section summarizes the cost and affordability of the housing stock to Escondido residents.

Homeownership Market

Median home prices in the North County areas of San Diego ranged from \$579,500 in Oceanside to \$1,200,000 in Encinitas (Figure 5). Median home sale prices in Escondido increased 13% between 2019 and 2020 (Table 32). All neighboring communities and the County, other than Encinitas, saw similar increases in median home sale prices.

FIGURE 5: MEDIAN HOME PRICE (2020)



Source: Corelogic.com California Home Sale Activity by City, August 2020.

Table 32: Changes in Median Home Sale Prices (2020)

Jurisdiction	2020		Percent Change in Median Sale Price 2019-2020
	Number Sold	Price	
Carlsbad	237	\$898,000	10.9%
Encinitas	79	\$1,200,000	-7.3%
Escondido	230	\$610,000	13.0%
Oceanside	275	\$579,500	9.3%
Poway	53	\$850,000	21.4%
San Marcos	162	\$652,500	10.6%
Vista	144	\$590,000	13.2%
San Diego Region	4,122	\$640,000	9.4%

Source: Corelogic.com California Home Sale Activity by City, August 2020.

Rental Market

The primary source of information on rental costs in the San Diego region is the San Diego County Apartment Association ("SDCAA"). SDCAA conducts two surveys of rental properties per year. For the Spring 2019 survey, 6,000 surveys were sent out to rental property owners and managers throughout San Diego County. Responses were received for 23,000 units. Although this survey sampled a broad variety of rental housing, it was not a scientific sampling. Table 33 shows that in the Spring of 2019, average monthly rents in Escondido ranged from \$1,490 for a one-bedroom apartment to \$2,273 for a three-bedroom apartment. Apartment rents tend to be slightly lower in Escondido than those in the County of San Diego.

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Table 33: Average Monthly Rent (2019)

Zip Code	Unit Type	Spring 2019 Units/ Properties Surveyed	Spring 2019 Monthly Rent	Spring 2019 Rent/Sq. Foot	Fall 2018 Monthly Rent	Spring 2018 Monthly Rent
Carlsbad 92008, 92009, 92010, 92011	Studio	11/3	\$1,214	\$3.26	\$1,099	\$1,081
	1 BR	44/4	\$1,724	\$2.60	\$1,457	\$1,635
	2 BR	457/6	\$2,546	\$2.53	\$2,685	\$2,448
	3+ BR	14/2	\$2,937	\$2.36	--	\$2,561
Encinitas 92023, 92024	Studio	0/0	--	--	--	\$1,289
	1 BR	4/1	\$1,800	\$3.27	\$1,295	\$1,581
	2 BR	5/2	\$2,100	\$2.98	\$2,145	\$1,840
	3+ BR	1/1	\$1,350	\$0.96	\$2,150	\$2,150
Escondido 92025, 90026, 90027, 90029, 90030, 90033, 90046	Studio	0/0	--	--	--	--
	1 BR	168/4	\$1,490	\$2.17	\$1,462	\$1,138
	2 BR	322/7	\$1,901	\$1.82	\$1,728	\$1,701
	3+ BR	45/9	\$2,273	\$1.68	\$1,784	\$2,143
Oceanside 92049, 92050, 92051, 92052, 92054, 92056, 92057, 92058	Studio	43/4	\$1,298	\$3.02	\$1,620	\$1,123
	1 BR	257/9	\$1,420	\$2.46	\$1,503	\$1,529
	2 BR	184/11	\$1,817	\$2.03	\$1,774	\$1,844
	3+ BR	3/3	\$1,960	\$1.38	\$2,195	\$1,995
Poway 92064 92074	Studio	0/0	--	--	--	--
	1 BR	12/1	\$1,695	\$2.42	--	\$1,000
	2 BR	40/1	\$1,885	\$1.98	--	--
	3+ BR	0/0	--	--	\$2,350	--
San Marcos 92069 92073 92076-79	Studio	27/1	\$1,905	\$3.30	--	--
	1 BR	39/1	\$2,030	\$2.93	\$1,021	\$1,387
	2 BR	95/3	\$2,089	\$2.10	--	\$1,586
	3+ BR	40/2	\$2,297	\$2.06	\$1,650	\$1,500
Vista 92081 92083-85	Studio	140/3	\$1,278	\$2.65	\$1,313	\$1,247
	1 BR	614/5	\$1,580	\$2.15	\$1,636	\$1,595
	2 BR	679/8	\$1,775	\$1.89	\$1,863	\$1,799
	3+ BR	57/4	\$2,051	\$1.74	\$2,493	\$1,881
County of San Diego (including City of San Diego)	Studio	659/56	\$1,315	\$3.03	--	--
	1 BR	8265/221	\$1,684	\$2.48	--	--
	2 BR	12143/301	\$2,071	\$2.04	--	--
	3+ BR	1933/121	\$2,526	\$2.01	--	--

Source: San Diego County Apartment Association Survey, Spring 2019.

Housing Affordability by Income Level

Housing affordability can be inferred by comparing the cost of renting or owning a home in the City with the maximum affordable housing costs for households at different income levels. Taken together, this information can generally show who can afford what size and type of housing and indicate the type of households most likely to experience overcrowding and overpayment.

Table 34 shows the maximum amount that a household can pay for housing each month without incurring a cost burden (over-payment). This amount can be compared to current housing asking prices (Table 32) and market rental rates (Table 33) to determine what types of housing opportunities a household can afford.

Extremely Low Income Households

Extremely low income households earn 30% or less of the County area median income – up to \$24,300 for a one-person household and up to \$34,650 for a five-person household in 2020. Extremely low income households cannot afford market-rate rental or ownership housing in Escondido without assuming a cost burden.

Very Low Income Households

Very low income households earn between 31% and 50% of the County area median income – up to \$40,450 for a one-person household and up to \$57,750 for a five-person household in 2020. Given the costs of ownership housing in Escondido, very low income households would not be able to afford a home in the City. Similarly, very low income renters could not afford appropriately-sized market-rate rental units in the City.

Low Income Households

Low income households earn between 51% and 80% of the County's area median income - up to \$64,700 for a one-person household and up to \$92,400 for a five-person household in 2020. Based on the asking prices of homes for sale in 2020 (Table 32), ownership housing would not be affordable to low income households. As of Spring 2019, most low income households in Escondido would not be able to find adequately sized affordable apartment units (Table 33).

Moderate income Households

Moderate income households earn between 81% and 120% of the County's Area Median Income – up to \$111,250 depending on household size in 2020. Moderate income households in Escondido would have trouble purchasing adequately-sized homes. Appropriately-sized market-rate rental housing is generally affordable to households in this income group.



Table 34: Affordable Housing Cost (2020)

Annual Income	Affordable Housing Cost	Utilities, Taxes, and Insurance		Affordable Price		
		Utilities	Taxes/Insurance	Sale	Rent	
Extremely Low Income (30% of Area Median Income)						
1-Person	\$24,300	\$608	\$164	\$213	\$60,846	\$444
3-Person	\$27,750	\$694	\$198	\$243	\$66,792	\$496
4-Person	\$31,200	\$780	\$240	\$273	\$70,498	\$541
5-Person	\$34,650	\$866	\$283	\$303	\$73,809	\$583
Very Low Income (50% of Area Median Income)						
1-Person	\$40,450	\$1,011	\$164	\$354	\$130,009	\$847
3-Person	\$46,200	\$1,155	\$198	\$404	\$145,806	\$958
4-Person	\$52,000	\$1,300	\$240	\$455	\$159,576	\$1,061
5-Person	\$57,750	\$1,444	\$283	\$505	\$172,736	\$1,161
Low Income (80% of Area Median Income)						
1-Person	\$64,700	\$1,618	\$164	\$566	\$233,862	\$1,454
3-Person	\$73,950	\$1,849	\$198	\$647	\$264,647	\$1,651
4-Person	\$83,200	\$2,080	\$240	\$728	\$293,192	\$1,841
5-Person	\$92,400	\$2,310	\$283	\$809	\$321,128	\$2,027
Median Income (100% of Area Median Income)						
1-Person	\$64,900	\$1,623	\$164	\$568	\$234,719	\$1,459
3-Person	\$74,150	\$1,854	\$198	\$649	\$265,504	\$1,656
4-Person	\$83,450	\$2,086	\$240	\$730	\$294,263	\$1,847
5-Person	\$92,700	\$2,318	\$283	\$811	\$322,413	\$2,035
Moderate Income (120% of Area Median Income)						
1-Person	\$77,900	\$1,948	\$164	\$682	\$290,392	\$1,784
3-Person	\$89,000	\$2,225	\$198	\$779	\$329,100	\$2,028
4-Person	\$100,150	\$2,504	\$240	\$876	\$365,782	\$2,264
5-Person	\$111,250	\$2,751	\$283	\$973	\$401,855	\$2,498

Source: CA Dept. of Housing and Community Development (2020) and Veronica Tam & Associates
 Assumptions: 2020 HCD income limits; 30% gross household income as affordable housing cost; 35% of monthly affordable cost for taxes and insurance; 10% down payment; and 3% interest rate for a 30-year fixed-rate mortgage loan. Utilities based on San Diego County Utility Allowance



3. Affordable Housing

State law requires that the City identify, analyze, and propose programs to preserve existing multi-family rental units that are eligible to convert to non-low-income housing uses due to termination of subsidy contract, mortgage prepayment, or expiring use restrictions during the next ten years. Thus, this at-risk housing analysis covers the period from June 30, 2020 through April 15, 2029. Consistent with State law, this section identifies publicly assisted housing units in Escondido, analyzes their potential to convert to market rate housing uses, and analyzes the cost to preserve or replace those units.

A. Publicly Assisted Housing

The City of Escondido has a large inventory of publicly assisted rental housing affordable to lower and moderate income households. Table 35 provides a summary listing of affordable projects in the City. Overall, 25 projects (totaling 1,659 rental housing units) include affordable units. Specifically, 1,642 units are set aside as housing for lower and moderate income households.

Name of Project	Total Units	Assisted Units	Funding Source	Type	Earliest Conversion
15 th Avenue Cooperative 1500 Orange Place	32	32	T, H	Family	2037
Aster Street 518-524/526-532 Aster Street	8	8	R, H	Family	2034
Aster Street 557-563 Aster Street	4	4	H	Family	2072
Avocado Court 215 E El Norte Parkway	36	35	R, H, T	Family	2067
Cobblestone Village Apartments 360 E Washington Avenue	44	43	R, T, C	Family	2055
Daybreak Grove 1256 E Washington Avenue	13	13	R, T	Family	2054
Emerald Garden Townhomes 425 W 11 th Avenue	16	16	R, H, T	Family	2053
Escondido Garden Apartments 500 N Midway Drive	92	91	T	Seniors	10/31/2038
Eucalyptus View Coop 1805 S. Escondido Blvd	24	24	H, T	Family	2041
Juniper Senior Village 215 E Washington Avenue	61	60	R, T, H, C	Seniors	2076
Las Ventanas 1404 S Escondido Boulevard	80	80	R, T	Family	2063
Manzanita 260 N Midway Drive	200	198	H, T	Family	2070
Orange Place Apartments 1611 S Orange Place	15	15	R, H, T	Family	2068



Table 35: Inventory of Assisted Rental Housing Projects

Name of Project	Total Units	Assisted Units	Funding Source	Type	Earliest Conversion
Silvercrest Residence 1303 Las Villas Way	75	74	HUD 202	Rental	4/30/2022
Solutions Escondido 1560 E Escondido Boulevard	33	32	R, T	Family	2070
Sonoma Court 508 E Mission Avenue	61	60	R, H, T	Family	2054
Summit Rose Apartments 460 E Washington Avenue	91	89	T	Family	2070
Sunrise Place 1245 E Grand Avenue	8	8	R, T	Family	2054
The Crossings @ Escondido 735 Mission Grove Place	55	54	R, T	Family	2065
The Crossings @ Escondido Manor 1150-1166 N Escondido Boulevard	44	43	R, H, T	Family	2070
The Terraces 1301 Morning Dew Drive	190	190	R, T	Family	2051
Veterans Villas 1538-1540 S Escondido Blvd	54	53	R	Veteran	2075
Via Roble 1553 S Escondido Boulevard	72	71	R, T, C	Family	2068
Villa Escondido 511 E Grand Avenue	112	112	T	Senior	2041
Village Grove Apartments 600 N Quince Street	161	160	T	Family	2054
Windsor Gardens 1600 W Ninth Avenue	132	130	R, T	Seniors	2074

R = Redevelopment Funds; H = HOME; C = CDBG; T = Low Income Housing Tax Credit
 Source: City of Escondido.

B. Preservation of At-Risk Housing

Within the 2021-2031 “at-risk” housing analysis period, only Silvercrest is at low risk of converting to market rate housing. Though Silvercrest’s earliest date of conversion is in 2022, the City considers the risk of conversion low because the project is being managed by a non-profit organization (The Salvation Army), which has the mission to provide permanent affordable housing. Furthermore, HUD has established priority for the renewal of project-based Section 8 assistance for housing for seniors and persons with disabilities.

Preservation and Replacement Options

To maintain the existing affordable housing stock, the City works to preserve the existing assisted units or facilitate the development of new units. Depending on the circumstances of the at-risk projects, different options may be used to preserve or replace the units. Preservation options typically include: 1) transfer of units to non-profit ownership; 2) provision of rental assistance to tenants using other funding

sources; and 3) purchase of affordability covenants. In terms of replacement, the most direct option is the development of new assisted multi-family housing units.

Transfer of Ownership

Transferring ownership of an at-risk project to a non-profit housing provider is generally one of the least costly ways to ensure that the at-risk units remain affordable for the long term. By transferring property ownership to a non-profit organization, low income restrictions can be secured and the project would become potentially eligible for a greater range of governmental assistance. However, Silvercrest is already a nonprofit-owned project; therefore, this option is not necessary. Specifically because Silvercrest is a nonprofit senior housing project, it is at low risk of converting to market-rate housing.

Rental Assistance

Tenant-based rent subsidies could be used to preserve the affordability of housing. Similar to Section 8 vouchers, the City, through a variety of potential funding sources, could provide rent subsidies to tenants of at-risk units. The level of the subsidy required to preserve the at-risk units is estimated to equal the Fair Market Rent ("FMR") for a unit minus the housing cost affordable by a lower income household.

The 2021 FMR for a one-bedroom unit in Escondido is \$1,540. As shown in Table 34, a very low income one-person household can generally afford about \$850 in rent, leaving an affordability gap of about \$690 (\$51,060 month for the 74 units or \$612,720 annually).

Purchase of Affordability Covenants

Another option to preserve the affordability of the at-risk project is to provide an incentive package to the owner to maintain the project as affordable housing. Incentives could include writing down the interest rate on the remaining loan balance, providing a lump-sum payment, and/or supplementing the rents to market levels. The feasibility and cost of this option depends on whether the complex is too highly leveraged and interest on the owner's part to utilize the incentives found in this option.

Construction of Replacement Units

The construction of new low income housing units is a means of replacing the at-risk units should they be converted to market-rate units. The cost of developing housing depends upon a variety of factors, including density, size of the units (i.e., square footage and number of bedrooms), location, land costs, and type of construction. With an estimated construction/land cost of \$350,000 per unit, the 75-unit Silvercrest would cost \$26.3 million to replace.

Resources for Preservation

Owners of government-assisted developments cannot terminate subsidy contracts, prepay a federally assisted mortgage, or discontinue use restrictions without first providing an exclusive "notice of opportunity to submit an offer to purchase" to potential purchasers using HCD's list of Qualified entities.

The List of current Qualified Entities is maintained and updated by HCD and is subject to change. - <https://www.hcd.ca.gov/policy-research/preserving-existing-affordable-housing.shtml>. Current entities on the list include:

- Innovative Housing Opportunities
- Nexus for Affordable Housing
- TELACU
- San Diego County Department of Housing and Community Development Services
- Housing Development Partners of San Diego

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4. Housing Constraints

Constraints to the provision of housing affect the development of new housing and the maintenance of existing units for all income levels. Governmental and non-governmental constraints in Escondido are similar to those in other jurisdictions in the region and are discussed below. One of the most, if not the most, significant and difficult constraints to housing in Escondido and elsewhere in the San Diego region is the high cost of land. This section describes various market, governmental, and environmental constraints on the development of housing that meets the needs of all economic segments of Escondido population.

A. Market Influences

Market constraints significantly affect the cost of housing in Escondido and can pose barriers to housing production and affordability. These constraints include the availability and cost of land for residential development, the demand for housing, financing and lending, construction costs, development fees, and neighborhood opposition which can make it expensive for developers to build affordable housing. The following highlights the primary market factors that affect the production of housing in Escondido.

Land and Construction Costs

Raw land and improvements costs comprise approximately 40% of the total development costs of a residential dwelling. Land prices in Escondido have risen significantly in recent years. However, land costs in Escondido are generally less when compared to land costs in many other areas of San Diego County. Furthermore, raw land values must be considered in relation to costs rising from the provision of adequate facilities and services, and the City's efforts to encourage redevelopment and rehabilitation will help lower costs where facilities and services are already provided.

The lack of vacant land for residential construction, especially land available for higher density residential development, has served to keep the cost of land high. Based on listings at Zillow.com, land near the downtown areas ranges from \$335,000 per acre to up to \$1.8 million per acre.⁵ Land outside of the urban core ranged from \$80,000 to \$155,000 per acre (and larger lots were available ranging from 1.5 to 5 acres).

Basic construction costs for residential developments have rapidly increased, and together with land prices, have increased the cost of housing, making homeownership unattainable for many households. These costs are relatively constant over the region. The basic components of labor and material do not fluctuate much by area. Site preparation costs can be substantial, but the variations are more a function of the site, than of the jurisdiction. The Freeman Construction Inc. Custom Home

⁵ Land size available at urban/downtown center at time of survey was less than one acre.

Building Home Guide in San Diego County estimates that site improvement costs can range from \$75,000 to \$150,000⁶.

One indicator of construction costs is Building Valuation Data compiled by the International Code Council (ICC). The unit costs compiled by the ICC include structural, electrical, plumbing, and mechanical work, in addition to interior finish and normal site preparation. The data are national and do not take into account regional differences, nor include the price of the land upon which the building is built. In 2020, according to the latest Building Valuation Data release, the national average for development costs per square foot for apartments and single-family homes in 2020 are as follows:

- Type I or II, R-2 Residential Multifamily: \$148.82 to \$168.94 per sq. ft.
- Type V Wood Frame, R-2 Residential Multifamily: \$113.38 to \$118.57 per sq. ft.
- Type V Wood Frame, R-3 Residential One and Two Family Dwelling: \$123.68 to \$131.34 per sq. ft.
- R-4 Residential Care/Assisted Living Facilities generally range between \$143.75 to \$199.81 per sq. ft.

Local estimates from the ProMatcher 2018 Cost Report estimated building costs in 2018 as ranging from \$128.71 - \$191.11 per square foot in Escondido.⁷

The City has no influence over materials and labor costs, and the building codes in Escondido are not substantially different than most other cities in San Diego County. In recent years, construction costs for materials and labor have increased at a slightly higher pace than the general rate of inflation according to the Construction Industry Research Board.

Availability of Financing

The availability of financing affects a person's ability to purchase or improve a home. Under the Home Mortgage Disclosure Act ("HMDA"), lending institutions must disclose information on the disposition of loan applications by the income, gender, and race of the applicants involving home purchases, improvements and refinancing, whether financed at market rate or with government assistance.

The disposition of loan applications submitted to financial institutions in 2017 for home purchase, refinance, and home improvement loans in Escondido is summarized in Table 36. Included is information on loan applications that were approved and originated, approved but not accepted by

⁶ <https://tfgonline.com/wp-content/uploads/2020/09/custom-home-building-cost-guide-in-san-diego-county-by-freemans-construction-inc.pdf>

⁷ Price range takes into account building a new home labor. Does include permitting, pouring the foundation, standard building materials, basic finishes, and cleanup. Cost does not include purchasing the land, blueprints, premium upgrades (granite countertops, spray foam insulation, etc.), modular homes, deep foundations, and deck construction. Reported by: ProMatcher Research Team. <https://home-builders.promatcher.com/cost/san-diego-ca-home-builders-costs-prices.aspx>



the applicant, denied, and withdrawn by the applicant or incomplete. Overall, home purchase financing is available but home improvement financing is more limited.

Table 36: Disposition of Home Loans (2017)

Loan Type	Total Applicants	Originated	Approved Not Accepted	Denied	Withdrawn/ Other
Conventional - Purchase	2,335	67.1%	4.1%	9.8%	19.0%
Government-Backed - Purchase	1,131	71.4%	3.8%	9.7%	15.1%
Home Improvement	545	52.3%	2.8%	27.0%	18.0%
Refinance	4,414	52.5%	2.6%	18.3%	26.6%
Total	8,426	59.0%	3.2%	15.3%	22.4%

Source: Lendingpattern.com
 "Percent Other" includes withdrawn or incomplete applications

Impacts of COVID-19

With the outbreak of the COVID-19 pandemic, over 26 million unemployment insurance claims were filed between March 15 and April 18 at the start of stay-at-home orders as reported by the US Department of Labor. In response Congress passed major relief bills including the \$2 trillion CARES Act, which includes benefits and expanded eligibility for unemployment insurance, forgivable small-business loans, economic relief payments sent directly to most US households, aid to state and local governments, and increased funding for housing assistance and other safety net programs.

The Census Bureau along with other governmental agencies partnered to design the Household Pulse Survey to publish data in as close to real time as possible during the COVID-19 pandemic. The survey provides vital insights on how American households are affected and coping during the pandemic. The Census Bureau expects to collect data for 90 days and release data weekly. One such way the Census Bureau is measuring household experiences during the coronavirus pandemic is through the Household Pulse Survey. Household Pulse Survey results have been reported for State and Metropolitan Area geographies but data for the San Diego Metropolitan Area only has not been reported. Results for the Week 23 Survey (Week of January 20 to February 1, 2021) showed that 56.3% (16.8 million) of adults in California reported that they or someone in their household had experienced a loss of employment income since March 13, 2020. About 10.3 million adult respondents (34.7%) also expected themselves or someone in their household to lose employment income in the next 4 weeks.

In the San Diego region, multiple reports have been completed by the SANDAG to show the impacts of COVID-19. On October 15, 2020 SANDAG published the "COVID-19 Impacts on The San Diego Regional Economy" report showing a six-month economic analysis since the Stay at Home Order. According to this report, an estimated 176,000 workers were unemployed due to COVID-19 in the San Diego region with lower income workers more likely to be out of work compared to middle and high income workers. Pre-COVID, the region had just over 50,000 unemployed workers. The report also identified the Tourism, Retail, and Education sectors as disproportionately affected by COVID-19. These sectors lost an estimated 141,000 workers, representing 80% of those unemployed due to

COVID-19 in the region. Females in the Education sector and Hispanic workers in the Tourism sector were also found to be more likely to lose their jobs during this period.

SANDAG also reported on June 16, 2020 that Black and Hispanic communities had been disproportionately impacted by COVID-19 throughout the County. These minorities account for a significant portion of essential workers who continued to go to work, and those who became unemployed in Tourism and “non-essential” Retail sectors due to the pandemic. Black and Hispanic populations were four times as likely to live in areas that had been impacted by COVID-19 and unemployment than White population and twice as likely when compared to the Asian population. Overall, the southern part of the County is also most affected by both the highest unemployment rates and highest percentage of COVID-19 cases in the region. Before the pandemic, areas in the southern region now most affected by the pandemic also reported household income of less than \$45,000 and a large share of families with children. The report classified ZIP codes with high unemployment rates and high percentages of COVID-19 cases as “hardest hit” areas.

As of June 1, 2020, Escondido was identified among the hardest hit ZIP codes. Of the ZIP codes reported, South Escondido ranked 16th in unemployment level and 24th in COVID-19 cases and East Escondido ranked 25th in unemployment level and 39th in COVID-19 cases. As of July 25, 2020 (the most recent data), Escondido remained among the hardest hit zip codes.

Timing and Density

Non-governmental market constraints can also include timing between project approval and requests for building permits. In most cases, this may be due to developers’ inability to secure financing for construction. In Escondido, the average time between project approval/entitlement and request for building permit is typically two to six months.

Requests to develop below the maximum or target densities may also be indicators non-governmental constraints. The Fifth Cycle Housing Element assumed that Housing Element sites would develop at approximately 75 % of the maximum density allowed in the Downtown Specific Plan Area and 70% in all other sites. A review of residential and mixed use projects proposed, approved, and constructed over the Fifth Cycle Housing Element found that projects averaged 80% maximum density in the Downtown Area (SP 9) and all other zonings averaged 90%, which is higher than as assumed in the Fifth Cycle sites inventory (Table 37).



Table 37: Project Development Yield Trends by Zoning

Zoning	Max Density Allowed	Average Yield % of Max
RE-30	1.5	102%
PD-R-1.9	1.9	99%
RE-20	2.2	82%
R-1-10	4.3	67%
R-1-7	6.2	66%
R-1-6	7.3	66%
R-1-X	7.3	40%
R-2-12	12	111%
R-3-18	18	140%
U-3 (GPA) - Was RE-20	18	98%
S-P	24-30	123%
SP-9 (Downtown)	75-100	80%
Average Yield % of all Projects		88%

In the Sixth Cycle Housing Element, the realistic capacity assumptions were adjusted to show the proposed East Valley Specific Plan Land Use target production points (Table 38). While there have been no residential projects under the EVSP yet, it is expected that projects will reach at least the target production point density to avoid paying fees. For areas outside of the EVSP, the realized densities averaged 88% of the maximum allowable density (see Table 37 above) and averaged 90% in lower density zones and 80% in higher density zones (Table 37 and Table 38). While recent production trends indicate that site capacity could reasonably be estimated at 88% of the maximum density allowed by zoning, some developments will likely be built at lower densities, so conservative assumptions were used. Additional discussion of development trends can be found under the Housing Resources Section (Development Trends, Yields, and Realistic Capacity for Housing).

Table 38: Assumed Realistic Capacities by Density range

Density Range	Assumed Realistic Density (% of Max)	Average Realized Density (Fifth Cycle)
EVSP		
21-30 (Urban IV/V)	83% ¹	N/A
20-80 (Mixed Use)	56% ²	N/A
Non-EVSP		
0-45	75%	90% ³
46-100	50%	80% ⁴

1 Based on 25 du/ac target production point (i.e. with a TPP of 25 du/ac, developments achieve at least 83% max density allowed)
 2 Based on 45 du/ac target production point
 3 Based on average of past projects with density range 0-30 (see Table 37)
 4 Based on average of past projects with density range 75-100 (see Table 37)

B. Governmental Constraints

Aside from market factors, housing affordability is also affected by factors in the public sector. Local policies and regulations can impact the price and availability of housing and, the provision of affordable housing. Land use controls, site improvement requirements, fees and exactions, permit processing procedures, among other issues may constrain the maintenance, development and improvement of housing. This section discusses potential governmental constraints in Escondido and efforts to address them.

Land Use Controls

The Land Use Element sets forth City policies for guiding local land use development. These policies, together with existing zoning regulations, establish the amount and distribution of land allocated for different uses. The City completed a comprehensive update to its General Plan in 2012. The General Plan update was focused around smart growth opportunities – adding new residential and employment capacity in areas well served by infrastructure and transit. The update also examined different land use policies and opportunities for growth, added a new high density residential category, and removed development constraints. Most future residential growth will continue to be focused in the Downtown Specific Plan and South Centre City Specific Plan areas. The General Plan also calls for the update of the East Valley Specific Plan (“EVSP”) for the area immediately adjacent to the downtown. In mid-2020, the City initiated the preparation of the EVSP, which is anticipated to complete in winter 2021/2022 and provide approximately 6,000 units that were not previously allocated in the General Plan.

Residential Land Use Designations

The land use policies of the City have a direct impact upon the provision of housing for all economic sectors of the community. The General Plan designates substantial areas of land for residential development, and the Zoning code permits a wide variety of residential uses, ranging from multi-family housing to large estates. Table 39 lists the residential land use designations in the General Plan. Higher-density multi-family designations were assigned minimum densities during the General Plan update.



Table 39: Land Use Designations Permitting Residential Use

Land Use Category	Zoning District	Max. Density (du/acre)	Character
Rural I	R-A	1 unit/4, 8, 20 acres	To promote a rural living environment in areas of agricultural production, rugged terrain, and environmentally constrained lands that are remote from urban development.
Rural II	R-A	1 unit/2, 4, 20 acres	To promote a rural living environment in areas of agricultural production or rugged terrain that is relatively remote from urban development.
Estate I	R-E	1 unit/1, 2, 4, 20 acre	To promote a large lot, single-family development in areas bordering Rural lands. This classification is typified by development along Mary Lane, North Broadway and around Felicita Park.
Estate II	R-E	Up to 2.0	To promote single-family urban development on relatively large lots. This classification typified by development at Lomas Serenas, Rancho Verde, and along Citrus Avenue around San Pasqual Valley Road.
Suburban	R-1	Up to 3.3	This residential classification is characterized by single-family homes. The density is appropriate where the traditional neighborhood character of detached single-family units prevails. This classification is typified by development at Summercreek and areas southeast of Bear Valley Parkway along Citrus Avenue and along the south side of Avenida del Diablo.
Urban I	R-1	Up to 5.5	Detached single-family homes, characteristic of much of Escondido, constitute this medium density category. Typical R-1 development is found along Country Club Lane and between Ash and Citrus north of Washington.
Urban II	R-2	Up to 12	This residential classification allows living accommodations, ranging from conventional single-family units to mobile homes. Development at this level of intensity normally would be semidetached or attached units, and include duplexes, triplexes, and fourplexes. Typical Urban II development is found on North Broadway between Lincoln and Sheridan Avenues, and Citrus Avenue between Valley Parkway and the Flood Control Channel.
Urban III	R-3	Up to 18	This residential category is typified by low-rise townhouses and apartment buildings. Typical projects at this density can be found near Centre City Parkway at El Norte, east Grand Avenue, and near Washington and Fig.
Urban IV	R-4	Up to 24	This residential category is predominantly characterized by apartment buildings about three stories in height. Representative development at this density is found south of 9th Avenue west of I15.
Urban V	R-5	Up to 30	This residential category is characterized by high-density, multi-family developments.

Source: Land Use Element, City of Escondido General Plan

Specific Plans

The City of Escondido has adopted a number of specific plans, which offer a range of housing types, densities, and mix of uses. The City anticipates that much of its new residential growth will occur in the following areas:

- Downtown Specific Plan (Revised February 10, 2021)
- South Centre City Specific Plan (April 4, 2018)
- East Valley Specific Plan (Revised September 22, 2004, and 2021)

Downtown Specific Plan Area

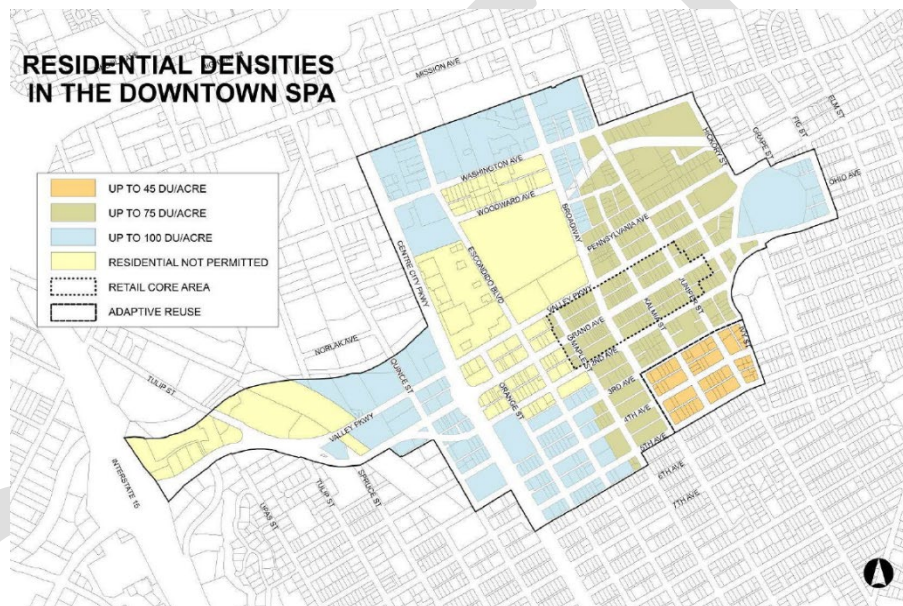
The Downtown Specific Plan area encompasses approximately 460 acres extending from I-15 and West Valley Parkway to Palomar Hospital, between Washington and Fifth Avenues. The Specific Plan Area includes the City's urban core along Grand Avenue where Escondido was incorporated in 1888. The Downtown Specific Plan provides a comprehensive plan for land use, development regulations, development incentives, design guidelines and other related actions aimed at implementing the following strategic goals for Downtown Escondido:

- An economically viable Downtown with an appropriate mix of retail, office, residential, entertainment and cultural uses.
- A local and regional destination for specialty shopping, dining, nightlife, employment, culture, and the arts.
- A vibrant and exciting environment with land uses that foster an "18-hour" atmosphere, in addition to areas that provide mixed-use, office employment and high-density residential opportunities.
- Development and signage that strengthen the character of Down-town and are architecturally compatible with the existing urban fabric.
- Street-level and human-scale design elements in new and remodeled developments that improve pedestrian orientation.
- Preserved historically significant sites and structures that enhance the character of Downtown.
- Pedestrian-oriented, ground-floor, specialty retail and restaurant uses on Grand Avenue that reinforce and expand its unique character.
- Higher residential densities in key locations that support Downtown non-residential uses. A pedestrian environment that provides connections, convenient access and opportunities for alternative modes of transportation.
- Embellished landscaping, public art, comfortable street furniture and décor that improves walkability and pedestrian connections.
- Maximized parking opportunities.

The Downtown Specific Plan includes seven distinct land use districts that allow for residential development or mixed-use development with substantial residential components:

- Historic Downtown District (HD)
- Park View District (PV)
- Centre City Urban District (CCU)
- Gateway Transit District (GT)
- Mercado District (M)
- Southern Gateway District (SG)
- Creekside Neighborhood District (CN)

FIGURE 6: DOWNTOWN ESCONDIDO SPECIFIC PLAN – RESIDENTIAL DENSITIES



Residential development above 45 units per acre can be accommodated in most of the Downtown Specific Plan area, with a substantial area allowing up to 75 units per acre and 100 units per acre. There are some areas where residential is not allowed and others where a ground-floor commercial or office component is required.

In 2019, the City adopted a "Downtown Density Transfer Program," which allows for the transfer of residential density from underutilized properties to properties that are being redeveloped. This program allows property owners to re-assign or transfer units to other properties via a city-administered density credit pool. The City holds the density credits until a redeveloping property acquires the density. In effect, the density transfer program prevents the loss of potential units when a property is redeveloped in support of achieving a full-build out in the Downtown area. Two entitled projects are utilizing the density transfer program. The project (ADM 20-0085) noted in Table A-3 in Appendix A is also contemplating the use of this program. There have also been requests to expand this program to other parts of the City.



The Downtown Specific Plan also establishes development standards that differ from the rest of the City. Table 40 summarizes the standards specific to the City's downtown area.

District	Maximum Building Height (ft.)	Setbacks (ft.)				Min. Lot Size	Max. Building Coverage	Allows Mixed Use?
		Front	Side Street	Side Yard	Rear Yard			
HD	45-120	0	0	0	0	None	None	Y
PV	35-85		10		5			
CCU	75		10		5			
GT	60-75		0	0	0			
M	60-75		0	0	0			
SG	35-75		0	0	0			
CN	75		10	5	10			

South Centre City Specific Plan

The South Centre City Specific Plan was adopted in 2018 to implement policy direction from the 2012 General Plan update that focused on implementing smart growth goals into four target growth areas. The plan contains eight districts, each with different development regulations and standards.

For residential land use, the plan seeks to maximize affordable housing opportunities and provide opportunities for a balanced mix of housing types through a variety of incentives and programs. The Plan provides for a Mixed-Use (MU) designation that permits the integration of residential, commercial, and professional office uses in a single project.

The plan allows for high density residential of up to 24 units per acre in the 9th Avenue Overlay, and up to 30 dwelling units per acre in the Escondido Boulevard Mixed-Use Overlay and the Southern Entry Mixed-Use Overlay zones.

East Valley Specific Plan

The East Valley Specific Plan ("EVSP") covers areas along East Valley Parkway. The existing land use pattern is a reflection of prior decisions, and uses along East Valley Boulevard are almost exclusively commercial in nature; there is no existing housing within the commercial area. The 2012 General Plan Update calls for the amendment of the area plan to re-assess the land use plan, in particular to introduce high-density housing to the area. The EVSP is expected to be adopted in winter 2021/2022. Table 41 provides a summary of the land use designations in the proposed EVSP.



Table 41: East Valley Specific Plan Land Use Designations

Land Use	Applicable Zoning	Description	Min. Density/ FAR	Max. Density/ FAR	Target Production Point	Appr. Yield
Urban IV/V	R-5-30	Assumes 24 du/ac. Multi-family residential units, townhomes, apartments, flats, and condominiums. 15,000 sf/ac retail and office uses are permitted	21 du/ac	30 du/ac	25 du/ac	1,495 units 453,789 sf of commercial
General Commercial	C-G	Local-serving commercial, automobile service, eating/drinking establishments, entertainment facilities, retail, office, service establishments, etc. Intended for other commercial uses not suitable for residential zones.	0.25 FAR	1.0 FAR	0.5 FAR	0 units 59,014 sf of commercial
Mixed-Use	M-U	Vertical or horizontal mixed-use. Multi-family residential units, appropriate along major thoroughfares, proximate to shopping centers, entertainment, community facilities and employment opportunities.	20 du/ac 1.5 FAR	80 du/ac 3.0 FAR	45 du/ac	4,669 units 703,338 sf of commercial
Park Overlay Zone	POZ	Active and passive parks as well as land to protect, maintain, and enhance the community's natural resources and include detention basins and creek corridors. Development Impact Fees contribute to park space in these areas.	---	---	---	10 acres minimum of parkland and open space

Growth Management Controls

The City has two growth management measures that impact the pace and capacity of residential growth:

- *Ordinance 94-16*
- *Proposition S*

Ordinance 94-16

This ordinance is a Citywide Facilities Management Plan that came into effect on May 18, 1994 and replaced all prior growth management ordinances. While facilities are generally available citywide, the North Broadway Region of Influence has had critical infrastructure deficiencies with respect to drainage and water storage capacity. The region is located in the northeast part of Escondido. Should adequate facilities not be available within the region, the ordinance allows development of projects subject to the approval of a development agreement. The agreement must ensure that the project either provides facilities necessary to upgrade existing deficiencies or financially participates toward their solution.

The North Broadway Deficiency Area is identified by the Citywide Facilities Plan as having critical infrastructure deficiencies. New land use development projects need to either provide facilities necessary to upgrade the deficiencies or cumulatively (i.e. financially) participate towards their solution. Ordinance 94-16 helps new land use development projects address off-site cumulative

CEQA issues as part of the entitlement process, which helps expedite CEQA review and streamline housing projects. The developer contribution of a \$12,500 per unit helps new projects participate in the costs of drainage and water storage requirements. Over the decade or so, there have been three large projects that have been constructed within this area, including 179 homes in Hidden Valley Ranch, 70 in Pradera, and 40 in Zenner (189 total homes). This demonstrates that the Ordinance 94-16 fee is not a constraint to housing development.

A subsequent ordinance (95-11) also allows development of a single-family residence on an existing vacant lot of record, zoned for residential use, where the lot was created prior to June 6, 1990, within the Region of Influence. A supplemental deposit is required at the time of Building Permit issuance to ensure facility impacts are addressed.

Proposition S

Proposition S was adopted by voters 1998 and requires voter approval of specified future changes to the Escondido General Plan. General Plan changes, subject to Proposition S, include increasing residential densities, changing or increasing the residential land use categories, or changing any residential designation to a commercial or industrial designation on any property designated as Rural, Estate, Suburban, or Urban. Thus, voter approval is required for amendments that would increase residential densities, but also deters the loss of residential land when associated with an amendment to commercial or industrial. Furthermore, Proposition S states, "Nothing in this initiative shall be constructed to:

- Interfere with rights to obtain density bonuses or other entitlements available under affordable housing laws, or Proposition S
- Limit right or entitlements available under affordable housing laws."

Prop S applies to the intensification of land uses in residential areas of the City. Specifically, under Policy E 2.3: "Permitted land uses in the residential areas of the City shall be intensified only when the voters approve such changes."

The intent of Prop S is to focus on current residential zones, rather than rezones from nonresidential to residential. A rezone from a non-residential zone to a residential zone does not trigger Prop S. Therefore, Prop S does not act as a cap on the number of housing units constructed or permits that can be approved either annually or for some other time period. It also does not limit the population of the City.

The City may amend the existing EVSP without a vote of the public and can therefore accommodate additional units within the East Valley Area for the 2021-2029 RHNA planning period. Outside of the East Valley Area, this Housing Element examines the residential development capacity under the existing General Plan, zoning, and specific plans, and has demonstrated adequate capacity to accommodate the City's RHNA for the sixth cycle Housing Element planning period.

The City recognizes that Proposition S may serve to constrain housing development in the long term, beyond 2028. Therefore, the City initiated a comprehensive General Plan update in 2008 to address

land use distribution, preservation of neighborhoods, and identification of appropriate growth centers within the community. The updated General Plan was approved by the City Council on May 23, 2012. Portions of the updated General Plan were placed on the November 2012 ballot and approved by Escondido residents.

The General Plan update preserved most existing land use policies in much of the City's residential neighborhoods, but did provide opportunities for employment and residential intensification. The maximum allowed density of a mixed-use development along South Escondido Boulevard was increased from 24 to 30 units per acre, which resulted in increased capacity in the City.

The approval of the General Plan update by the voters increased the City's capacity for residential growth over the long term. Recognizing Proposition S as a potential constraint, the Housing Element includes a program to monitor the impact of this growth management measure.

Overlay Zones and Other Districts

Mixed Use Overlay Zone

As part of the 2012 General Plan update, new areas for mixed-use development were designated in areas with high potential for commercial and residential development.

Flood Plain Overlay Zone

The Flood Plain (FP) overlay zone establishes land use regulations in areas with properties situated within designated flood plains of rivers, creeks, streams and water courses in order to protect the public health, safety and welfare and to minimize losses to property and life due to flooding and periodic inundation. The City restricts or prohibits uses in this zone which are dangerous to health, safety or property in times of flood or cause excessive increases in flood heights or velocities. The City also requires uses vulnerable to floods to be protected against flood damage at the time of initial construction.

Planned Development (P-D) Zone

The purpose of the Planned Development (P-D) zone is to provide a more flexible regulatory procedure by which the basic public purposes of the Escondido general plan and the Escondido zoning code may be accomplished and to encourage creative approaches to the use of land through variation in the siting of buildings and the appropriate mixing of several land uses, activities and dwelling types.

For planned developments in which residential uses are proposed on parcels of land in the R-3, R-4, and R-5 zones, area plans, and in specific plan areas with a maximum specified multifamily residential density, no planned development will be approved at a density below 70% of the maximum permitted density of the underlying multifamily zone, area plan or specific plan multi-family designation. Residential planned developments in this zone are also encouraged to depart from standard subdivision and housing design by providing a variety of lot sizes and housing types, provided that the overall residential density yield conforms with the City's policies.

Old Escondido Neighborhood Historic District

The boundaries of this District are Fifth Avenue on the north, Chestnut Street on the east, Thirteenth Avenue on the south and South Escondido Boulevard on the west (excluding properties fronting on Escondido Boulevard) and including north side of Fifth Avenue from Juniper to Date. The purpose and intent of the Old Escondido Neighborhood historic district is to preserve the single-family residential character of the neighborhood and the historic / cultural resources of the neighborhood as well as emphasize orientation towards pedestrian activities. The historic nature of this district precludes higher density residential re-use.

Density Bonus and Residential Incentive Ordinance

Government Code section 65915 et. seq. requires an agency to provide developers with a density bonus and other incentives or concessions for the production of lower income housing units or for the donation of land within the development if the developer agrees to construct a specified percentage of units for very low, low, and/or moderate income households or qualifying residents. Density bonus is a California state requirement and as such not subject to the discretion of local governance bodies – land use development requests that meet the law's requirements are entitled to the Density Bonus, as of right. The City adopted its Density Bonus and Residential Incentive Ordinance in the 1990s. In 2018, the California Legislature approved four bills that expanded the density bonus to a wider range of housing projects and strengthened procedures to make the density bonus more workable for developers. The current ordinance (Chapter 33, Article 67), last updated May 2020, allows a minimum density bonus and deviations from the Zoning Code for affordable or senior housing in accordance with the State Density Bonus Law (California Government Code Sections 65915 – 65918) and reflects the State Legislature's commitment to incentivizing housing development in California. Since parking and setbacks can be reduced, a developer could feasibly increase the number of units or bedrooms without increasing the size of the site. The City's Density Bonus and Residential Incentive Ordinance is useful in the acquisition and rehabilitation of developments made affordable to low income residents in the higher multi-family zones. For example, the ordinance was utilized to increase the number of bedrooms in the acquisition and rehabilitation of the 15th Avenue Cooperative and Sonoma Court, affordable housing projects. Furthermore, the South Centre City Specific Plan has an added provision to allow three or more units to be a qualifying project under Density Bonus Law.

Current State law requires jurisdictions to provide density bonuses and development incentives to all developers who propose to construct affordable housing on a sliding scale, where the amount of density bonus and number of incentives vary according to the amount of affordable housing units provided. Specifically, State law requires the provision of certain incentives for residential development projects that set aside a certain portion of total units to be affordable to lower and moderate income households. Under State law, a development of more than five units is eligible to receive density bonuses if it meets at least one of the following:

- At least 5% of the housing units are restricted to very low income residents.

- At least 10% of the housing units are restricted to lower income residents.
- At least 10% of the housing units in a for-sale common interest development are restricted to moderate income residents.
- 100% of the housing units (other than manager's units) are restricted to very low, lower and moderate income residents (with a maximum of 20% moderate).
- At least 10% of the housing units are for transitional foster youth, disabled veterans or homeless persons, with rents restricted at the very low income level.
- At least 20% of the housing units are for low income college students in housing dedicated for full-time students at accredited colleges.
- The project donates at least one acre of land to the city or county for very low income units, and the land has the appropriate general plan designation, zoning, permits and approvals, and access to public facilities needed for such housing.
- The project is a senior citizen housing development (no affordable units required).
- The project is a mobile home park age-restricted to senior citizens (no affordable units required).

AB 2345 was passed in September 2020, amending the Density Bonus Law to increase the maximum density bonus from 35% to 50%. To be eligible for the maximum bonus, a project must set aside at least (i) 15% of total units for very low income households, (ii) 24% of total units for low income households, or (iii) 44% of for-sale units for moderate income households. Levels of bonus density between 35% and 50% are granted on a sliding scale. Cities must update their density bonus ordinances to codify these new bonus requirements. This Housing Element includes a program to update the City's Density Bonus provisions to be consistent with the most recent changes in State Density Bonus Law.

The Density Bonus and Residential Incentives Ordinance encourages development of housing for lower income and senior households. Other processes in the Zoning Ordinance help in the development of housing for the higher income households as well as the lower income households. Escondido has an income distribution that skews toward the lower income compared to the region. As a means to diversify the City's socioeconomic profile, the City retains certain amount of large-lot zoning to accommodate the housing needs and preferences of moderate and higher income households. This strategy is aimed at satisfying high-tech businesses desiring to locate in Escondido. Planned Developments, Specific Plans and Administrative Adjustments are also available to assist in the development and rehabilitation of housing for all economic sectors of the community.

These processes are particularly helpful where properties may be constrained. Specific Plans and Planned Developments allow for clustering of smaller lots into buildable areas, while preserving unique or environmentally sensitive areas such as ridgelines, stream courses and steep slopes. Planned Developments and Specific Plans are useful for large scale developments, while administrative adjustments are more useful on a small scale basis where deviations from the code

may enable the development on a constrained site or an addition to an existing single-family home or apartment complex.

Residential Development Standards

Citywide, outside the specific plan areas, the City regulates the type, location, density, and scale of residential development primarily through the Zoning Code. The following summarizes the City's existing residential zoning districts:

- *Residential Agricultural (R-A) – 1 unit per 5 to 10 acres:* This zone is designed to protect agricultural uses from encroachment by urban uses until residential, commercial or industrial uses in such areas become necessary or desired. The densities in this zone are based on the minimum lot sizes of 5 to 10 acres.
- *Residential Estates (R-E) – 0.2 to 2 units per acre:* This zone is to provide an area exclusively for single-family dwellings in a rural setting. Provisions are made for the maintenance of limited agricultural pursuits as well as those uses necessary and incidental to single family living. The densities in this zone are based on the minimum lot sizes of 20,000 square feet to 210,000 square feet.
- *Single-Family Residential (R-1) – 1.74 to 7.26 units per acre:* This zone is to encourage and promote a suitable environment for family life by providing a district for the establishment of one-family, detached dwellings, exclusively. The densities in this zone are based on the minimum lot sizes of 6,000 square feet to 25,000 square feet.
- *Mobile Home Residential (R-T):* This zone is established to encourage and promote a suitable environment for family life by providing a district for one-family detached mobile homes.
- *Light Multiple Residential (R-2) – 12 units per acre:* This zone is established to provide low height, low density residential areas in close proximity to single-family residential neighborhoods.
- *Medium Multiple Residential (R-3) – 18 units per acre:* This zone, is established to provide medium density, low-height residential areas for two, three and multifamily dwelling units.
- *Heavy Multiple Residential (R-4) – 24 units per acre:* This zone is established to provide an area for a suitable environment for family life for those wishing to live in apartments near the city's center.
- *Very High Multi-Family Residential (R-5) – 30 units per acre:* This zone is established to provide a multi-family setting for family life in higher-height, very high density dwelling units in close proximity to other multi-family neighborhoods and near the city's center.

Development standards specific to each zone district are designed to protect and promote the health, safety, and general welfare of residents as well as implement the policies of the General Plan. These standards also serve to preserve the character and integrity of existing neighborhoods. Specific residential development standards are summarized in Table 42.

Generally, development standards can limit the number of units that may be constructed on a particular piece of property. These include density, minimum lot and unit sizes, height, and open



space requirements. Limiting the number of units that can be constructed will increase the per-unit land costs and can, all other factors being equal, result in higher development costs that may impact housing affordability.

Table 42: Residential Development Standards

Zoning District	Maximum Building Height (ft.)	Minimum Net Lot Area (sq. ft.)	Minimum Lot Width (ft.)	Setbacks (ft.)			Maximum Lot Coverage	Floor Area Ratio
				Front	Rear	Side		
R-A	35	217,800	150	25	20	10	20%	0.3
R-E	35	20,000	100	25	20	10	30%	0.4
R-1	35	6,000	60	15	20	5	40%	0.5
R-T	--	4,500	55	15	5	5	60%	--
R-2	25	6,000	60	15	15	5	--	0.6
R-3	35	6,000	60	15	10	5	--	0.7
R-4	75	6,000	50	15	10	5	--	0.8
R-5	75	6,000	50	15	10	5	--	0.9

Source: City of Escondido Zoning Ordinance, 2020.

Setback Requirements

Setback requirements can encourage or discourage development. As seen on Table 42, the City's residential setback requirements are minimal. The City also offers adjustments to requirements (up to 25%) with the approval of the Community Development director. Even further reductions to setback requirements for landscaping and parking are available to affordable or senior housing proposals, pursuant to the Residential Incentive Ordinance.

Building and Parcel Requirements

Building and parcel requirements for residential development can also encourage or discourage development. While development standards are necessary in order to preserve the character of that particular zone, those that are too restrictive can increase development costs and inhibit or reduce the achievable number of permitted dwelling units.

Building and parcel requirements in the City are not overly restrictive and offer the flexibility needed to encourage development. Minimum parcel sizes vary, depending on the zone, and are minimal in the multi-family zones. Minimum unit sizes are closely tied to the minimum standards required by the State for health and safety purposes. Lot coverage and floor area ratios are high enough to have little or no constraint on development proposals. And usable open space requirements are low and can be lowered further for affordable and senior housing development proposals. Building and parcel requirements in the Downtown and South Centre City Parkway areas are even less restrictive than those of the single-family and multi-family zones.

Zone Changes and General Plan Amendments

Residential zone changes that propose density increases consistent with the General Plan do not require an initiative or a referendum. Pursuant to proposition S, General Plan amendments involving an increase in residential densities or change from residential to commercial or industrial require a majority vote by the people.

Proposition S specifies that General Plan amendments or specific plans cannot be adjusted without a vote of the people, if changes increase residential density, alter or increase the General Plan's residential land use categories, or change any Rural, Estate, Suburban or Urban residential designation to a commercial or industrial designation. Thus, voter approval is required for amendments that would increase residential densities, but also deters the loss of residential land when associated with an amendment to commercial or industrial.

The General Plan update was approved by the City Council on May 23, 2012 and portions involved voter approval decided at the November 2012 election; Escondido residents approved the changes to the General Plan. The updated General Plan provides for increased residential development capacity through mixed-use development, primarily along South Escondido Boulevard. Most other residential areas retain their current General Plan and zoning designations. Furthermore, Proposition S states, "Nothing in this initiative shall be construed to:

- Interfere with rights to obtain density bonuses or other entitlements available under affordable housing laws, or
- Limit right or entitlements available under affordable housing laws."

Additionally, few residential subdivisions have been denied, and current zoning allows multi-family development by right with ministerial processing only.

Parking Standards

High numbers of parking spaces required per dwelling unit can negatively impact the feasibility of providing affordable housing by reducing the achievable number of dwelling units per acre and increasing development costs. The cost and amount of required parking has a high impact on the cost of housing. Typically, the concern for high parking standards relates mostly to multi-family, affordable, or senior housing. Escondido's requirements for single-family and multi-family residential are summarized in Table 43. In some instances, tandem spaces are permitted and in others, guest parking may be provided on-street.



Table 43: Escondido Residential Parking Requirements

Type of Residential Development	Required Parking Spaces Per Unit
Single-Family or Two-Family Residence	Two (2) car garage or carport spaces
Accessory Dwelling Unit	Zero (0) parking spaces
Multiple-Family Dwelling*	
Efficiency Unit	One (1) parking space
One-Bedroom Unit	One and one-half (1.5) parking space
Two-Bedroom Unit	One and three-quarter (1.75) parking space
Three or More Bedrooms	Two (2) parking spaces
Senior housing	Two (2) plus three (3) for every four (4) efficiency units or one bedroom units. Units with two (2) or more bedrooms require one and one-half (1.5) spaces per unit.
Source: City of Escondido Zoning Ordinance, 2020	
* One space is required for each four (4) units required for guest parking	

Escondido’s Density Bonus and Residential Incentive Ordinance allows parking reductions for affordable and senior development at the following ratios: one space/one-bedroom unit; 1.2 spaces/two-bedroom unit, and 1.5 spaces/three-bedroom unit. These standards are lower than even the State-mandated parking standards for density bonus projects. Additionally, on-street resident parking for affordable or senior units can be substituted for required off-street parking at a ratio of one-to-one on non-Circulation Element streets. Requirements to cover spaces can also be waived.

Provision for a Variety of Housing Opportunities

Housing element law specifies that jurisdictions must identify adequate sites to be made available through appropriate zoning and development standards to encourage the development of a variety of housing types for all economic segments of the population. This includes single-family homes, multi-family housing, second units, mobile homes, emergency shelters, and housing for persons with disabilities. Table 44 below summarizes the various housing types permitted within the City’s zoning districts.



Table 44: Use Regulations for Residential Zones

Use	R-A	R-E	R-1	R-T	R-2	R-3	R-4	H-P	C-G	Mixed Use Overlay
Single-Family Dwelling	P	P	P	--	P	P	P	--	--	--
Accessory Dwelling Unit	P	P	P	--	P	P	P	--	--	--
Multi-Family Dwelling	--	--	--	--	P	P	P	--	--	P
Mobile Home Park	C	C	C	C	C	C	C	--	--	--
Manufactured Housing	P	P	P	P	--	--	--	--	--	--
Care Facility (6 or fewer)	P	P	P	P	P	P	P	C	C	P
Care Facility (7 or more)	C	C	C	--	C	C	C	C	C	P
Senior Housing	P	P	P	P	P	P	P	--	--	P
Transitional (6 or fewer)	P	P	P	P	P	P	P	P/C	P/C	P
Transitional (7 or more)	C	C	C	C	C	C	C	P/C	P/C	P
Disabled (6 or fewer)	P	P	P	P	P	P	P	--	--	P
Disabled (7 or more)	C	C	C	C	C	C	C	--	--	P
Single Room Occupancy	--	--	--	--	--	--	--	--	--	C
Farm Worker Housing	P	P	--	--	--	--	--	--	--	--

P = Permitted Use
 C = Conditional Use
 Source: City of Escondido Zoning Code, 2020

Single-Family Dwelling

“Single-family dwellings” are defined in the Zoning Code as detached or semi-detached buildings. Single-family dwellings are permitted in all residential zones, except the R-T zone. As part of the General Plan update, the City established a 70% minimum density for R-3, R-4, and R-5 zoning districts, effectively discouraging single-family homes to be developed on properties designated for multi-family uses. This change promotes the efficient use of the City’s residential land and mitigates neighborhood compatibility issues.

Accessory Dwelling Units

Accessory dwelling units (“ADUs”) and junior accessory dwelling units (“JADUs”) are attached or detached dwelling units that provide complete independent living facilities for one or more persons including permanent provisions for living, sleeping, cooking and sanitation. ADUs may be alternative source of affordable housing for lower-income households and seniors. Recent state laws, including AB 68, AB 587, AB 670, AB 881, AB 671 and SB 13 in 2019 and AB 3182 in 2020, require cities to use a ministerial process to consider accessory dwelling units in an effort to facilitate the production of affordable housing state-wide. Accessory units must be permitted in all residential and mixed-use zones where a residential unit already exists.

Recent ordinances by the City of Escondido have updated the zoning provisions related to ADUs and JADUs. In 2020, the City amended the Zoning Code to comply with AB 68, AB 587, AB 670, AB 671, AB 881, AB 3182 and SB 13 to reflect changes to Government Code section 65852.2 and section

65852.22. The City of Escondido permits ADUs and JADUs in area zoned to allow single-family or multi-family residential use, subject to the approval of an ADU permit. ADUs must also comply with the development standards of the underlying zone, except where precluded by state law. Other requirements for accessory dwelling units include:

- The owner of the property must reside on the parcel on which a JADU is located.
- No limit on the number of bedrooms is allowed.
- A setback requirement of not more than four feet for detached accessory dwelling units.
- Any development standards that regulate the size of the ADU must permit at least an 850 square foot ADU to be constructed.
- The accessory unit shall respect the residential scale and design character of existing homes.

Additionally, the zoning code has a provision that states that the section “shall be interpreted liberally in favor of accessory dwelling unit construction,” which further removes constraints on ADU production in case of ambiguities in the standards. The City does not require any parking for ADUs or JADUs. Copies of Ordinance No. 2020-31R was transmitted to HCD in accordance with Government Code 65852.2(h)(1).

Multi-Family Dwelling

According to the State Department of Finance, multiple-family housing makes up approximately 36% of the 2020 housing stock in Escondido (Table 26). The Zoning Code provides for multi-family developments in the higher density residential zones (R-2, R-3, and R-4, R-5) and in specific plans. The maximum density for the R-5 zone is 30 units per acre.

Mobile Home Parks and Manufactured Housing

Manufactured housing and mobile homes can be an affordable housing option for low and moderate income households. Mobile homes represent about eight percent of the City's housing stock as of January 2020. A mobile home built after June 15, 1976, certified under the National Manufactured Home Construction and Safety Act of 1974, and built on a permanent foundation may be located in any residential zone where a conventional single-family detached dwelling is permitted subject to the same restrictions on density and to the same property development regulations. Manufactured/ mobile homes are permitted in all of the City's lower density residential zones (R-A, R-E, R-1 and R-T). In today's construction methods, manufactured housing can also apply to multi-family housing construction. The Zoning Code will be amended to permit manufactured homes meeting the California Building Code standards to be permitted where residential uses are permitted.

Residential Care Facilities

Residential care facilities licensed or supervised by a Federal, State, or local health/welfare agency provide 24-hour non-medical care of unrelated persons who are handicapped and in need of personal services, supervision, or assistance essential for sustaining the activities of daily living or

for the protection of the individual in a family-like environment. The Community Care Facilities Act (California Health and Safety Code) and Lanterman Developmental Disabilities Services Act (California Welfare and Institution Code) require that State-licensed residential care facilities serving six or fewer persons (including foster care) be treated as a regular residential use and therefore must be permitted by right in all residential zones allowing residential uses. These facilities cannot be subject to more stringent development standards, fees, or other standards than the same type of housing single-family homes in the same district.

The City amended its Zoning Code, in accordance with the Lanterman Developmental Disabilities Services Act of the California Welfare and Institutions Code and the Health and Safety Code in 2004. The amendment clarifies that the use of property for the care of six or fewer disabled persons is a "residential use" for the purposes of zoning. A State-authorized, certified or authorized family care home, foster home, or group home serving six or fewer disabled persons or dependent and neglected children on a 24-hour-a day basis is considered a residential use that is permitted in all residential zones. The amendment also clarifies that in Commercial and Hospital Professional zones, licensed residential care facilities serving any number of residents are permitted by right, and in residential zones (except the R-T zone), licensed residential care facilities serving more than six persons are permitted with a Conditional Use Permit. The CUP process may be considered a constraint to housing for persons with disabilities.

Emergency Shelters

Senate Bill 2, enacted in October 2007, requires local governments to identify one or more zoning categories that allow emergency shelters (year-round shelters for the homeless) without discretionary review. The statute permits the City to apply limited conditions to the approval of ministerial permits for emergency shelters. The identified zone must have sufficient capacity to accommodate at least one year-round shelter and accommodate the City's share of the regional unsheltered homeless population. The San Diego Regional Task Force on the Homeless "We All Count 2020" found that Escondido's homeless population is estimated to be 429 individuals, 264 of those individuals are unsheltered.

In 2013, the City amended its zoning code to add an Emergency Shelter Overlay Zone subject to the following standards:

- Each shelter shall be located within an entirely enclosed, permanent structure.
- Each shelter may have a maximum 50 beds to serve a maximum of 50 clients.
- The maximum length of stay at any one time for any person shall be six months in any 12-month period.
- Parking shall be two spaces per facility plus one space for each employee.
- There shall be no camping or sleeping in vehicles on site.
- An emergency shelter shall be located at least 300 feet from another shelter.
- Each shelter shall conform to the requirements of the Outdoor Lighting Ordinance.
- The emergency shelter operator shall submit a written management plan.

The zone allows for year-round emergency shelters and can accommodate the City's unsheltered homeless population. Emergency shelters are allowed without discretionary approval in the overlay zone. The zone is approximately 69 acres and encompasses 64 parcels zoned for M-1 and M-2 (light industrial), which are currently occupied by mostly light industrial, commercial, and warehousing uses. Some buildings in the area are antiquated, with deferred maintenance issues, and were developed below the allowable intensity. Therefore, development of emergency shelters in this area can occur either as new construction on one of the underutilized properties, or as adaptive reuse of an existing vacant building (or just a portion of the building). The overlay zone is appropriate for emergency shelters since it contains underutilized properties and is located near the Nordahl Road transit station and the new Palomar Hospital.

In 2020, the City amended the Zoning Code to comply with AB 139, which sets parking standards based primarily on staffing level only. Ordinance 2020-31R amended the Zoning Code to require two spaces per facility plus one space for each employee. This standard is slightly inconsistent with AB 139. Furthermore, the City will amend the Zoning Code to revise the separation requirement to a maximum of 300 feet pursuant to SB 2 (2007).

Transitional and Supportive Housing

California Health and Safety Code (Section 50675.2) defines "transitional housing" and "transitional housing development" as buildings configured as rental housing developments, but operated under program requirements that call for the termination of assistance and recirculation of the assisted unit to another eligible program recipient at some predetermined future point in time, which shall be no less than six months.

Residents of transitional housing are usually connected to supportive services designed to assist the homeless in achieving greater economic independence and a permanent, stable living situation. Transitional housing can take several forms, including group quarters with beds, single-family homes, and multi-family apartments and typically offers case management and support services to help return people to independent living (often six months to two years).

Supportive housing links the provision of housing and social services for the homeless, people with disabilities, and a variety of other special needs populations. California Health and Safety Code (Section 50675.2) defines "supportive housing" as housing with no limit on length of stay, that is occupied by the low income adults with disabilities, and that is linked to on-site or off-site services that assist the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community. Target population includes adults with low incomes having one or more disabilities, including mental illness, HIV or AIDS, substance abuse, or other chronic health conditions, or individuals eligible for services provided under the Lanterman Developmental Disabilities Services Act (Division 4.5, commencing with Section 4500, of the Welfare and Institutions Code) and may, among other populations, include families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, or homeless people.

Escondido's Zoning Code makes provisions for transitional and permanent supportive housing. Transitional and supportive housing that is operated as regular housing developments (i.e. no state care license) is permitted by-right in all residential zones, regardless of size or on-site services. Transitional and supportive housing that is operated as group quarters with six or fewer persons is permitted by right in all residential zones. Transitional and supportive housing that is operated as a group quarters with seven or more persons is conditionally allowed in all residential zones except the R-T zone (Mobile Home Park Zone). Potential conditions for approval of large residential care facilities (for more than six persons) as transitional/supportive housing may include hours of operation, security, loading requirements, noise regulations, and restrictions on loitering. Conditions would be similar to those for other similar uses and would not serve to constrain the development of such facilities. SB 745 (2014) specifies that transitional housing and supportive housing should be considered a residential use of property, and subject only to those restrictions that apply to other residential dwellings of the same type in the same zone. This would extend residential uses as permitted in mixed use and nonresidential zones. Pursuant to AB 2162 (2018), supportive housing meeting certain criteria must be permitted by right where residential uses are permitted, including mixed-use and nonresidential zones. Escondido's Zoning Code does not permit mixed-use development outside of specific plan areas; these plans do not explicitly identify transitional and supportive housing as separate from residential uses. The City will review SB 745 and AB 2162 and ensure compliance.

Senior Housing

The Zoning Code permits senior housing (for persons aged 55 or over) as regular housing across the City. Senior Housing is allowed by right in all residential zones.

Single Room Occupancy Units (SROs)

Single Room Occupancy ("SRO") units are one-room units intended for occupancy by a single individual. They are distinct from a studio or efficiency unit, in that a studio is a one-room unit that must contain a kitchen and bathroom. Although SRO units are not required to have a kitchen or bathroom, many SROs have one or the other and could be equivalent to an efficiency unit. The zoning code officially classifies SROs as "rooming house, boarding house, mini-dorms, etc. with central kitchen, interior access to sleeping rooms). The City conditionally allows these uses in the R-2, R-3, R-4, and R-5 zones, and in some districts of the South Centre City Specific Plan.

Farm Worker Housing

Pursuant to the State Employee Housing Act (Section 17000 of the Health and Safety Code), employee housing for agricultural workers consisting of no more than 36 beds in a group quarters or 12 units or spaces designed for use by a single-family or household is permitted by right in an agricultural land use designation. For properties that permit agricultural uses by right, a local jurisdiction may not treat employee housing that meets the above criteria any differently than an agricultural use. Furthermore, any employee housing providing accommodations for six or fewer employees shall be deemed a single-family structure within a residential land use designation,

according to the Employee Housing Act. Employee housing for six or fewer persons is permitted wherever a single-family residence is permitted. To comply with State law no conditional use permit or variance is required.

The City's Zoning Code allows, as a permitted use in open space (O-S), agricultural and estate residential zones (R-A and R-E), living quarters for persons employed on the premises in conjunction with authorized agricultural uses. The City will review the Zoning Code to ensure compliance with the Employee Housing Act.

Low Barrier Navigation Centers

Low Barrier Navigation Centers ("LBNC"s) are service-enriched shelters that are focused on moving individuals into more permanent housing. Low Barrier Navigation Centers provide temporary housing while case managers connect individuals experiencing homelessness to shelter, public benefits, and health services. Under the Housing for Homeless Act (2019), local governments are required to allow Low Barrier Navigation Centers by right in areas zoned for mixed-uses and nonresidential zones that permit multi-family uses.

The City amended the Zoning Code with Ordinance 2020-31R to address the provision of LBNC in CG, CN and CP zones where there are mixed-use overlay areas that are zoned for mixed-use and nonresidential zones permitting multi-family uses.

Housing for Persons with Disabilities

Both the federal Fair Housing Amendment Act ("FHAA") and the California Fair Employment and Housing Act direct local governments to make reasonable accommodations (that is, modifications or exceptions) in their zoning laws and other land use regulations when such accommodations may be necessary to afford disabled persons an equal opportunity to use and enjoy a dwelling. The City conducted an analysis of the zoning ordinance, permitting procedures, development standards, and building codes to identify potential constraints for housing for persons with disabilities. The City's policies and regulations regarding housing for persons with disabilities are described below.

Land Use Controls

Under State Lanterman Developmental Disabilities Services Act (also known as the Lanterman Act), small licensed residential care facilities for six or fewer persons must be treated as regular residential uses and permitted by right in all residential districts. In accordance with State law (Lanterman Developmental Disability Services Act, AB 846, compiled of divisions 4.1, 4.2 and 4.7 of the Welfare and Institutions Code and Title 14 of the Government Code), Escondido allows residential care facilities serving six or fewer persons within all residential zones. Residential care facilities serving more than six persons are conditionally permitted in all residential zones except the mobile-home park zone (R-T). The City does not have a local requirement for proximity between two special needs housing sites.

The City's Zoning Code provides for transitional/supportive housing as residential care facilities only. The Zoning Code will be amended to address the provision of these housing types pursuant to State laws (see discussions above).

Definition of Family

Local governments may restrict access to housing for households failing to qualify as a "family" by the definition specified in the Zoning Code. Specifically, an overly restrictive definition of "family" that limits the number of and differentiates between related and unrelated individuals living together could illegally limit the development and siting of group homes for persons with disabilities, but not for housing families that are similarly sized or situated.

The City of Escondido Zoning Code defines a "family" as "one or more persons related by blood, marriage, or adoption, or a group including unrelated individuals living together as a relatively permanent, bona fide, housekeeping unit." The City's definition of family does not restrict access to housing.

Building Codes

The Building and Safety Division actively enforces the California Building Code provisions that regulate the access and adaptability of buildings to accommodate persons with disabilities. No unique restrictions are in place that would constrain the development of housing for persons with disabilities. Government Code Section 12955.1 requires that 10% of the total dwelling units in multi-family buildings without elevators consisting of three or more rental units or four or more condominium units subject to the following building standards for persons with disabilities:

- The primary entry to the dwelling unit shall be on an accessible route unless exempted by site impracticality tests.
- At least one powder room or bathroom shall be located on the primary entry level served by an accessible route.
- All rooms or spaces located on the primary entry level shall be served by an accessible route. Rooms and spaces located on the primary entry level and subject to this chapter may include but are not limited to kitchens, powder rooms, bathrooms, living rooms, bedrooms, or hallways.
- Common use areas shall be accessible.
- If common tenant parking is provided, accessible parking spaces is required.

Reasonable Accommodation

Both the Federal Fair Housing Act and the California Fair Employment and Housing Act direct local governments to make reasonable accommodations (i.e. modifications or exceptions) in their zoning laws and other land use regulations when such accommodations may be necessary to afford disabled persons an equal opportunity to use and enjoy a dwelling. For example, it may be reasonable to accommodate requests to waive a setback requirement or other standard of the

Zoning Ordinance to ensure that homes are accessible for the mobility impaired. Whether a particular modification is reasonable depends on the circumstances.

The City adopted an amendment to the Zoning Code establishing a formal reasonable accommodations procedure in 2001. The Zoning Code gives authority to the Director of Community Development (or his/her designee) to make decisions regarding reasonable accommodation requests. There is no fee imposed on the request for reasonable accommodation. However, if the project for which the request is being made also requires some other planning permit or approval, then the applicant must file the request together and submit the required fees associated with the related permits.

In determining the reasonableness of a requested accommodation, the Director will consider the following factors:

- Whether the housing which is the subject of the request for reasonable accommodation will be used by an individual protected under the Acts;
- Whether fulfillment of the request is necessary to make specific housing available to an individual protected under the Acts;
- Whether the accommodation will impose an unreasonable financial or administrative burden on the City;
- Whether the accommodation will require a fundamental alteration of the zoning or building laws, policies and/or procedures of the City;
- Whether the accommodation will have any potential impact on surrounding uses;
- Physical attributes of the property and structures; and
- Any other factor deemed relevant to the determination according to the Acts, as amended.

The requirement to be compatible with surrounding uses may be considered subjective and potentially constraining development of housing for persons with disabilities.

Permits and Processing

A request for a retrofit of property to increase accessibility would be handled through the building permit process, if the retrofit is of a nature to be governed by the building code. Group homes, with fewer than six persons, are permitted by right in the residential zones. Modifications to the structure would be made through the building permit process, if the modifications proposed are under building code jurisdiction.

Depending on the zone classification of the property, a group home for more than six persons requires either a plot plan or a Conditional Use Permit. There is no standard list of conditions; each site would be reviewed and conditions assigned based on the specifics of the site and proposed project. A plot plan does not require a public hearing. A Conditional Use Permit requires a public hearing by the Planning Commission.

Development Conditions and Fees

Residential developers are subject to a variety of fees and exactions to process permits and provide necessary services and facilities as allowed by State law. In general, these development fees can be a constraint to the maintenance, improvement, and development of housing because the additional cost borne by developers contributes to overall increased housing unit cost. However, the fees are necessary to maintain adequate public services and facilities in the City in concert with adopted Quality of Life Standard thresholds set forth in the General Plan. These fees have not been found to act as a constraint to the development of housing in Escondido.

Planning processing costs are covered in part by applicant fees. Development impact fees are charged to a new development to pay for the local infrastructure needed to serve it. Within the San Diego region, all 18 of the local jurisdictions and the County charge development impact fees. Impact fees can be charged for a variety of public facilities, including utilities, parks, open space, fire stations, libraries, and transportation improvements such as streets, highways, and transit.

Development impact fees enable the City to shift at least part of the capital-financing burden to new development, and synchronize new development with the installation of these new public facilities. Escondido's impact fees fall within the average when compared to those of the other jurisdictions. Additionally, the City conducts a periodic review of the fees to insure they reflect the current impacts and necessary improvements for the standard level of service. To facilitate residential development in the Downtown area, the City charges reduced impact fees in the Downtown area.

Table 45 summarizes the most common planning and development impact fees for the City of Escondido and other North County cities. In general, the City's fees are comparable to developments in other North San Diego communities. Table 46 compares the estimated total fees for typical projects based on a fee survey conducted by the Building Industry Association of San Diego. As shown, fees in Escondido fall within the middle to low end of the spectrum compared to other communities in the region. The fee amounts reported below for the City of Escondido include inflationary adjustments, adopted pursuant to R2020-125 on October 28, 2020, effective on February 22, 2021.

To facilitate residential development in the current economic climate, the City revised its Development Fee Deferral Policy in June 2012. This revision expanded the existing policy to allow residential developers (for projects of five or more units) to defer payment of development fees until occupancy, not to exceed one year from building permit issuance.



Table 45: Planning and Development Fees Regional Comparison (2020)

	Escondido Single Family Residential	Escondido Multi-family Residential (cost per unit)	Carlsbad Single Family	Carlsbad Multi-family	Oceanside Single Family	Oceanside Multi- family
Planning Fees						
Design Review/ Development Review	\$524.97 - \$846.97		varies		\$7,000 - \$10,000	
Major Use Permit/ Conditional Use Permit	\$6,972.97		\$4,913		\$5,000	
Tentative Parcel Map	\$3,970.97		\$3,678 - \$4,169		\$3,000	
Tentative Subdivision Map	\$6,128.87 - \$12,652.57		\$8,193		\$8,000	
Environmental Review- Initial Study/Addendum	\$2,565.00		\$2,753+		\$5,000	
General Plan Amendment	\$5,968.18 - \$6,954.45		\$4,677 - \$6,747		\$10,000 - \$15,000	
Impact/Capacity Fees						
Facilities Fee	\$4,969	\$4,969	\$15,423	\$9,039	\$2,621	\$2,621
Parks Fee	\$6,986	\$6,663	\$7,649	\$6,190	\$4,431	\$4,431
Traffic Impact Fee	\$4,191	\$2,095	\$7,500	\$6,000	\$1,032	\$582
Drainage Fee	\$1,136	\$469	\$2,054	\$3,589	\$2,054	\$976
Other Fees	\$15,430	\$9,148	\$16,324	\$12,398	\$46,330	\$8,718
Total per Unit	\$32,712	\$23,344	\$49,243	\$33,986	\$56,468	\$17,328
Source: City of Escondido (Updated February 23, 2021), City of Carlsbad, City of Oceanside.						



Table 46: Total Fee Comparisons (2019-2020)

Jurisdictions	Per Unit Permit and Impact Fees			
	Single Family	Townhome (Type V Construction)	Condominium (Type III Construction)	Apartment (Type V Construction)
Carlsbad	\$42,616.78	\$23,012.02	\$17,086.21	\$16,762.04
Chula Vista	\$57,167.97	\$42,481.32	\$38,577.18	\$38,596.86
Encinitas	\$22,932.15	\$15,984.48	---	\$15,233.65
Escondido	\$37,044.15	\$31,185.86	\$29,360.35	\$29,360.35
Imperial Beach	\$15,161.22	\$11,262.71	\$9,832.14	\$21,010.37
La Mesa	\$27,442.49	\$19,242.63	\$14,248.72	\$12,906.75
Lemon Grove	\$13,563.65	\$6,259.63	\$4,870.52	\$5,106.55
National City	\$15,025.99	\$5,655.93	\$4,175.54	\$4,175.54
Oceanside	\$68,235.30	\$25,089.74	\$17,254.33	\$17,178.01
Poway	\$26,528.05	\$21,194.22	\$2,059.13	\$20,898.17
San Diego	\$155,367.00	\$103,121.73	\$95,731.81	\$97,461.70
San Marcos	\$30,761.34	\$25,588.10	\$23,410.80	\$14,184.14
Santee	\$78,142.00	\$67,667.00	\$64,247.00	\$57,827.00
San Diego County	\$21,797.00	\$12,793.00	\$10,900.00	\$11,156.00
Vista	\$27,546.37	\$20,804.79	\$23,176.90	\$18,608.86

Source: BIA 2019-2020 Fees Study for San Diego County; City of Santee Fee Schedule FY2020-21; Padre Dam Municipal Water District Sewer and Water Capacity Fee Schedule 2021; Santee Elementary School District Developer Fees 2021; Grossmont Union High School District Developer Fees 2021

In 2020, the City conducted a Fiscal Impact Assessment that determined that the cost to serve new residential development generally exceeds the revenue generated from that development. In order to ensure that new residents within the city continue to receive the services at their current level, a Community Facilities District ("CFD") has been created as one potential mechanism to fund municipal services associated with new residential development. A CFD is special tax levied annually on the property tax bill. Also known as a Mello-Roos, this tax can be used to fund improvements required to support the development of new homes or the ongoing costs to serve new development. In accordance with Resolution No. 2020-44, adopted on May 13, 2020; Ordinance No. 2020-10, adopted on June 3, 2020; and Ordinance No. 2020-24, adopted on October 21, 2020; and as otherwise authorized by the City's longstanding General Plan policies and authority under State law, new residential development is expected to fund all on-going operational costs of providing municipal services required for the project. Such funding may occur through either an agreement to voluntarily form or annex into a CFD or the establishment of another lawful funding mechanism to offset the impacts to public services associated with the project. With respect to the CFD, for new residential units within the City limits, the FY20/21 adopted special tax rates range from \$536 to \$783 per dwelling unit.

Although Resolution No. 2020-44, Ordinance No, 2020-10, and Ordinance No. 2020-24 were enacted to protect the health and safety of citizens and further the general welfare, the City will periodically re-examine the aforementioned policies to determine whether, under certain conditions, if they directly or indirectly constitute a barrier to the maintenance, improvement, or development of housing for all income levels. As previously mentioned, this 2021-2029 Housing Element was prepared under the cover of a Housing and Community Investment Study, which among other things identifies all relevant land use controls and their impacts on the cost and supply of housing, including the CFD policies. A Sector Feasibility Study was prepared and shows that the cumulative impacts of standards and policies, including the policy that contemplates new residential development funding the on-going costs of municipal services required by such development, does not impede the ability to achieve maximum allowable densities. Such an examination may reveal that certain policies have a disproportionate or negative impact on the development of particular housing types (e.g., multi-family) or on housing developed for low or moderate income households. However, affordable housing projects and other organizations that meet the requirements of Revenue and Taxation Code section 214 may qualify for a Property Tax Welfare Exemption.

The City will continue to monitor whether ordinances, policies, or practices related to development conditions and fees, such as those covered in this section or those newly contemplated during this housing element cycle, have the effect of unduly constraining the maintenance, improvement, or development of housing, including but not limited to excluding housing affordable to low- and moderate-income households.

Transparency in Development Process

To increase transparency and certainty in the development application process as required by law (AB 1483), the City has a variety of tools available for developers. The City's Planning Division website has links to the City's zoning ordinance, zoning parcel look-up tool, and other resources (<https://www.escondido.org/planning.aspx>). Direct links are also provided below:

- Zoning Ordinance: <http://www.qcode.us/codes/escondido/view.php?topic=33>
- Parcel look-up tool: <https://www.escondido.org/parcel-lookup.aspx>
- Planning Fee schedule: <https://www.escondido.org/Data/Sites/1/media/Planning/FeeSchedule2020.pdf>

On- and Off-Site Improvements

Infrastructure is already in place in multi-family areas. Development standards vary depending on the land use pattern in the area. Street width requirements (curb to curb) are 36 feet for public and 28 feet for private rural residential streets, 42 for local collectors, 64 for collectors and 82 for major roads. Full curb and gutter are required, with the standard five-foot wide sidewalk per ADA requirements.

Water and sewer capacity must be adequate to meet normal and emergency situations with a water capacity to provide a minimum of 540 gallons of water per day per household and a sewage capacity to treat a minimum of 250 gallons per day for each residence. The City is also required to comply to

NPDES (National Pollution Discharge Elimination System) storm water standards with structural and non-structural methods, such as the use of detention basins, catch basin and filters, and drains.

Requirements for on- and off-site improvements vary depending on the presence of existing improvements, as well as the size and nature of the proposed development. In general, the City requires the following improvements and facilities for new developments:

- *Grade Improvements:* The City requires developers to grade and improve all land dedicated or to be dedicated for streets or easements, bicycle ways and all private streets and private easements involved in a Final Map or Parcel Map in such manner and with such improvements as are necessary in accordance with the Escondido City standards.
- *Sewers:* The City requires developers to install sewers or sewage disposal systems in accordance with the Private Sewage Disposal Systems ordinance.
- *Water Supply:* The City requires developers to provide proof satisfactory to the City Engineer that there exists an adequate potable water supply available to each lot or parcel and that the developer will install or agree to install water supply facilities to the satisfaction of the City Engineer provided that the City Engineer may require such other system or size of water supply pipe as recommended by the water facility serving the project.
- *Fire hydrants:* The City requires developers to install as required by the City Engineer, fire hydrants and connections, which hydrants and connections shall be of a type approved by the Escondido Fire Chief.
- *Public Sewer system:* When the City Engineer determines that, by reason of the size and shape of the proposed lots, the nature of the terrain to be subdivided, the soil condition of the lots and the development of the area in the vicinity of the proposed subdivision, a public sewer system serving the lots will be required to preserve the public health, or if there is a public sewer main within two hundred (200) feet of the property boundary, the developer shall be required to install or agree to install a public sewer system serving said lots as a condition precedent to the approval of any Final or Parcel Map.
- *Undergrounding Utilities:* All new and existing utilities distribution facilities, including cable television lines and other communication facilities within the boundaries of any new subdivision or within any property abutting a proposed new subdivision, shall be placed underground pursuant to the requirements of Escondido Municipal Code.
- *Flood Control:* The developer is required to install all flood control and drainage improvements in conformance with the drainage policies of the General Plan, the Drainage Master Plan, the Engineering Division Policy for Drainage Studies, and City design standards.
- *Street Trees:* The developer is required to install street trees as required by Escondido City standards pursuant to the landscape standards of the Zoning Code.
- *Traffic Control Signals:* The developer is required to install such traffic control signals as may be required by the City Engineer, Planning Commission or City Council.

Building Codes and Enforcement

The City of Escondido has adopted the 2019 California Building Code. The City has also adopted the 2019 Green Building Standards Code. No amendments have been made that diminish the ability to accommodate persons with disabilities. There are no locally amended universal design elements; the universal design provisions of the California Building Code are enforced. Exceptions or methods of alternative compliance to the requirements of the California Building Code are contained in the code. The City has no local ability to waive the provisions of the State building codes. However, a mechanism within the building code allows for an appeal process to challenge interpretations of the building code requirements.

The Code Enforcement Division, which is a section of the Community Development Department, enforces applicable building codes. Code enforcement is reactive and prioritized based on risks to health and safety. However, code enforcement remains complaint-based and investigates complaints to determine appropriate steps for correction. Code Enforcement also refers households that may qualify for assistance to the City's rehabilitation programs.

Permits and Processing Times

Government Code section 65943 states that local governments have 30 days after an application for a housing development project is submitted to inform the applicant whether or not the application is complete. If the local government does not inform the applicant of any deficiencies within that 30-day period, the application will be "deemed complete", even if it is deficient. If the application is determined to be incomplete, the local government shall provide the applicant with an exhaustive list of items that were not complete pursuant to the local government's submittal requirement checklist. Information not included in the initial list of deficiencies in the application cannot be requested in subsequent reviews of the application.

The processing time needed to obtain development permits and required approvals is commonly cited by the development community as a prime contributor to the high cost of housing. Depending on the magnitude and complexity of the development proposal, the time that elapses from application submittal to project approval may vary considerably.

The Community Development Department is currently preparing a development processing guide with the newcomer to the permit process in mind. It details the steps involved in obtaining a zoning or building permit(s) – from preliminary review through final approval. This information will help people who have had little or no experience with the building permit process. Experienced building professionals will also find information about the required amount of processing time useful for their scheduling and/or seek streamlining opportunities.

Processing Times

Factors that can affect the length of development review on a proposed project include: completeness of the development application submittal, responsiveness of developers to staff comments and requests for information, and projects that are not exempt from the California



Environmental Quality Act ("CEQA"), require rezoning or general plan amendment, or are subject to a public hearing before the Planning Commission or City Council.

Certainty and consistency in permit processing procedures and reasonable processing times is important to ensure that the development review/approval process does not discourage developers of housing or add excessive costs (including carrying costs on property) that would make the project economically infeasible. The City is committed to maintaining comparatively short processing times. Total processing times vary by project, but most residential projects are approved in six months. Table 47 provides a detailed summary of the typical processing procedures and timelines of various types of projects in the City.

Project Type	Reviewing Body	Public Hearing Required	Appeal Body (if any)	Estimated Total Processing Time
Single-Family Subdivision	Planning Commission	Yes	City Council	3-6 months
Multiple-Family	Staff/ Administrative	No	Planning Commission	12-20 weeks
Multiple-Family (with subdivisions)	Planning Commission and City Council	Yes	None	4-6 months
Mixed Use	Planning Commission and City Council	Yes	None	4-6 months

For apartment projects, processing periods normally require an administrative review and take approximately 12 to 20 weeks from the time of submittal of a complete application to the time of construction. Below are the required steps in the following order:

- Submit Plot Plan Application
- Environmental and Plot Plan Review
- Building and Grading Permits Construction Plans Submittal
- Resubmit Construction Plans as needed.
- Permits Issued

Other residential development proposals require administrative, Planning Commission, or City Council approval as shown below:

Administrative Approval

Staff review – up to 10 weeks:

- Lot Line Adjustments
- Certificate of Compliances
- Parcel Maps
- Administrative Adjustments

- Second Dwelling Units

Planning Commission Approval

Public hearing – up to 16 weeks including environmental review:

- Conditional Use Permits
- Grading Exemptions (for grading exceeding requirements)
- Precise Development Plans
- Tentative Subdivision Maps
- Variances

City Council Approval/with Planning Commission Recommendation

Public hearing – up to 26 weeks including environmental review:

- Zone Changes (rezones and pre-zones)
- General Plan Amendments
- Extensions of Time for Tentative Subdivision Maps
- Planned Developments
- Specific Plans
- Condominium Permits
- Habitat Loss Permits
- Development Agreements

City Council Approval/with Planning Commission Recommendation

The processing time for the most common residential development applications are summarized in Table 48. These applications are often processed concurrently. The City continues to explore ways to streamline the processing of applications and reduce fees for redevelopment/ rehabilitation of affordable, fair market and mixed-use housing. The City also explores ways to encourage development of housing for middle- and high-income households in order to promote a balanced community. The City conducted an evaluation to streamline processes and processing times. Specifically, the City consolidated the Design Review Board into the Planning Commission. In so doing, the City eliminated one step in the review process, thereby shortening the timeframe of review.



Table 48: Processing Time by Process / Permit

Process/Application	Time
Conditional Use Permit	3-6 months
Design Review	0 weeks (concurrent review)
General Plan Amendment	4-6 months if no public vote is needed
Environmental Impact Reports	9-12 months
Plan Check/ Building Permits	15-20 working days for plan check, or longer depending on resubmitted plan checks and how fast architect responds to corrections
Variance	3-6 months
Zone Change	4-6 months

Source: City of Escondido Planning Department, 2020.

Design Review Process

The design review process is regulated by Municipal Code Chapter 33, Article 64. The purpose of design review is to preserve the natural charm, integrity and quality of the built environment, by regulating the design and appearance of development in order to ensure compatibility with existing development and ensure that new development is consistent with or exceeds the high quality of the development projects currently located in the City.

Design review takes the following into account: site development, circulation, grading, setbacks, exterior appearance of buildings, structures, signs, lighting, street furniture, landscaping and other outdoor appurtenances. The review of plans is done either by City staff or by the Planning Commission in conjunction with other discretionary reviews. Depending on the project approval, Planning staff review the projects for compliance with the design review standards and provides recommendations to the Planning Director regarding administrative projects that require design review, or the Planning Commission. In order to gain approval, the following findings must be made:

- The proposed site plan has been designed in a manner which is compatible with the natural and urban characteristics of the site and the surrounding neighborhood.
- The bulk, scale, and architectural design of the proposed structure is compatible with the character of the surrounding neighborhood.
- The project incorporates landscaping, irrigation and screening which is drought tolerant, appropriate for the site, and in compliance with the landscape standards established by the city.
- All grading related to the project conforms to design standards set by Article 55 (grading and erosion control).
- The project incorporates applicable design review standards contained in the Zoning Code and other applicable ordinances into the site layout and building design.
- The project is consistent with the goals and objectives on the General Plan.

These findings are reasonable and do not constrain housing development in the City. Typical revisions required by staff or the planning commission include: changes to landscape materials; building elevation details / enhancements / articulation; changes to colors; and minor site plan adjustments. Usually, these changes can be accommodated without increasing the costs of development.

Decisions of the Director may be appealed to the Planning Commission by filing a written request to the Planning Division within ten days following the final decision of the Director. Decisions of the Planning Commission may be appealed to the City Council.

Conditional Use Permit

A conditional use permit is a zoning instrument used primarily to review the location, site development or conduct of certain land uses. These are uses which generally have a distinct impact on the area in which they are located, or are capable of creating special problems for bordering properties unless given special attention. The Planning Commission has the authority to grant, conditionally grant or deny a conditional use permit application, with one exception: The decision on whether or not to issue a conditional use permit for residential care facilities for the handicapped lies with the Director of Planning and Building. In order to be approved, the Planning Commission must make the following findings:

- A conditional use permit will be granted upon sound principles of land use and in response to services required by the community.
- A conditional use permit will not be granted if it will cause deterioration of bordering land uses or create special problems for the area in which it is located.
- A conditional use permit must be considered in relationship to its effect on the community or neighborhood plan for the area in which it is to be located.

Planning Commission decisions can be appealed to the City Council. Most residential uses are permitted by right in residential zones. Therefore, the CUP process does not serve to constrain housing development.

C. Environmental and Infrastructure Constraints

A community's environmental setting affects the feasibility and cost of developing housing. Environmental issues range from the availability of water to the suitability of land for development due to potential exposure to seismic, flooding, wildfire and other hazards. If not properly recognized and accommodated in residential design, these environmental features could potentially endanger lives and property. This section summarizes these potential constraints on residential development in Escondido.

Soil, Steep Slopes, and Seismic Safety

Regulation of development in areas of steep slopes is directly related to public safety and health, as the degree of slope is related to flood control problems, erosion control, landslides, and fire hazard. These problems become particularly acute on slopes greater than 25%. Accordingly, many communities, including the County, map slopes greater than 25%, recognizing them as potentially hazardous areas. Similarly, many of the soil compositions that comprise the Escondido Planning Area present difficulties for development in that they cannot support roadways or foundations, are unacceptable for septic systems, and are highly erodible.

The historical seismicity of the San Diego region is low compared to the rest of Southern California. This may be due to San Diego being on a more stable block or it may only be a reflection of a period of historical record which is too short to be meaningful. San Diego County has experienced strong shaking and damage from several earthquakes, but none of the recent ones have been particularly destructive.

All of the faults which could affect San Diego County are part of the San Andreas system of faults. The portion of California west of San Andreas fault is part of the Pacific plate and is moving north with respect to the rest of the continent which is part of the North American plate. This movement is distributed among several faults in addition to the main San Andreas Fault. In and near San Diego County these other faults include the San Jacinto, Coyote Creek, Earthquake Valley, Agua Caliente, Elsinore, Rose Canyon, San Miguel (Mexico), Agua Blanca (Mexico), and Coronado Banks (off shore).

The largest fault in the San Diego region, the San Andreas Fault, is at least 800 miles long and is located 27 miles east of Borrego in the Coachella Valley. There is increasing concern that the 85-mile section from north of San Bernardino to the Salton Sea is overdue to rupture, having been "locked" for the last 200 years. Such an event could cause an 8.3 magnitude earthquake - the size of the 1906 San Francisco quake. An 8.3 event on the San Andreas would subject San Diego County of shaking of intensity VII to VIII, enough to cause considerable damage.

East of San Diego the closest active fault is the Elsinore Fault, which passes through the town of Elsinore, along the south side of Palomar Mountain, through Lake Henshaw, Santa Ysabel Indian Reservation, down Banner Canyon east of Julian, and out in the desert near Vallecitos. The Elsinore Fault apparently joins the Laguna Salada Fault on the east side of the Sierra Cocopah in Baja California. The Elsinore Fault is probably capable of generating an earthquake of magnitude 7.4.

Depending upon which segment moved, considerable damage might occur in Escondido, Ramona, Julian, Borrego, and Jacumba. Portions of all of the roads to the east would probably be temporarily closed by landslides.

The Community Protection and Safety Element of the City's General Plan includes goals, policies, and actions that are designed to reduce the risks of hazards related to soil, steep slopes, and seismic activity, such as the strict enforcement of standards from the Uniform Building Code and the requiring of specific geotechnical reports.

Flood Hazards

There are sections of the City that would be subject to inundation in the event of a 100-year storm. These areas include northern portions of Reidy Creek north of Rincon Avenue, an area alongside Escondido Creek west of Hale Avenue, along Kit Carson Park Creek north of Via Rancho Parkway, an area straddling Midway Drive north of the Escondido Channel, and an area straddling Valley Parkway between Ash and Citrus.

The Community Protection Element of the City's General Plan includes policies to designate appropriate land uses to minimize flood related damages and to ensure proper creek and channel maintenance to ensure their water-carrying capacity.

The City maintains floodplain standards to minimize flood risks to existing and proposed developments. Projects built in the floodplain area may be subject to additional findings and risk mitigation, but the floodplain standards do not prohibit or constrain housing developments located within the floodplain. The City has recently approved a 145-unit affordable housing project (Quince Street Senior Apartments) that was partially built within the floodplain. The recent project example demonstrates that flood hazards do not create actual constraints on development.

Hazardous Materials

Hazardous materials represent a potential threat to those who are working with the materials and those who could be affected by its improper or accidental disposal. The cleanup of hazardous wastes from the past and the handling and disposal of newly generated wastes will affect people many generations from now. Site contamination may impair the City's ability to implement this Plan by increasing the costs of development, requiring certain land use restrictions, and causing delays while necessary cleanups are implemented. The policies presented in the Community Protection Element of the City's General Plan are intended to protect the public from existing and future hazardous contamination problems.

Ridgeline and Hillside Conservation

One characteristic that distinguishes Escondido from other communities in the region is its location in a series of valleys that are surrounded by visually distinctive hillsides and ridgelines. The varied topography has been identified as one of Escondido's most important assets – one that has helped create the City's distinct identity. To protect these assets, the City outlined a series of policies in its

Resource Conservation Element that are geared toward controlling development on the hillsides and along the ridgelines.

Water Supply

Water supply for the City stems primarily from two sources: local water, derived from precipitation, and stored in Lakes Henshaw and Wohlford, and imported water transmitted by the San Diego County Water Authority. A master plan, administered by the City ensures the adequacy of these facilities to meet the demands imposed by development projected over the General Plan horizon. Continued urban development will place increasing demands on these supplies. Potential limitations on the availability of supplies require the need to combine long-term planning for water supply with long-term planning for community development in Escondido. Limited areas of the City are provided water service by the Rincon del Diablo Water District.

The 2012 Water Master Plan was prepared at the same time and under the same assumptions as the 2012 Escondido General Plan Update, which identified new growth within the same East Valley area as that contemplated for the East Valley Specific Plan. The General Plan Update considered a range of 3,350 to 5,825 new residential units that would be added to the General Plan's build-out projection of approximately 67,900 dwelling units. The plan describes a number of capital improvement projects over the next thirty years, including water recycling, demand management measures, and conservation rebates to ensure the availability of water to meet the City's projected build-out.

Wastewater Capacity

Escondido's wastewater is treated at the Hale Avenue wastewater treatment plant, conveyed over land, and discharged through an ocean outfall. A Master Plan, administered by the City, ensures the adequacy of these facilities to meet the demands imposed by development projected over the General Plan horizon. Significantly, the availability of sewer service distinguishes between urban development and rural development. Thus, the extension of services and the availability of capacity will influence how much and where Escondido grows.

The Environmental Impact Report ("EIR") for General Plan Update concludes that existing wastewater treatment capacity is not adequate to accommodate the growth anticipated under the General Plan Update, which would add over 9,400 units by 2035. The Escondido Water and Wastewater Division (EWWD) updated its sewer master plan to ensure adequate sewage treatment capacity to serve the projected buildout population of the updated General Plan. Wastewater demands in the Escondido service area, resulting from the 2021-2029 Housing Element sites inventory, has already been studied and accommodated by the 2012 Wastewater Master Plan. Adequate sewage treatment capacity is projected to accommodate the growth allowed under the current General Plan and Sixth Cycle Housing Element.

Priority for Water and Sewer Services

Much of the new housing growth is expected to occur within the EVSP area. Adequate water and sewer services are available to accommodate the City's projected Regional Housing Needs Assessment. Nevertheless, Senate Bill 1087 (enacted 2006) requires that water and sewer providers develop written policies that grant priority to proposed development that includes housing affordable to lower-income households. The legislation also prohibits water and sewer providers from denying or conditioning the approval of development that includes housing affordable to lower income households, unless specific written findings are made. As the water and sewer service provider, the City will include a policy in this Housing Element to prioritize services. The City will also provide a copy of the adopted Housing Element to the Rincon del Diablo Water District, which serves portions of the City, within 30 days of adoption. The City will continue to coordinate with Rincon to ensure priority service provision to affordable housing developments.

DRAFT



5. Housing Resources

A. Regional Housing Needs Assessment

The Regional Housing Needs Assessment (“RHNA”) allocates to each city and county in California a “fair share” of the region’s projected housing needs by household income group. The major goal of the RHNA is to ensure a fair distribution of housing among cities and counties within their respective regions, so that every community provides an opportunity for a mix of housing for all economic segments.

The San Diego Association of Governments (“SANDAG”) adopted its RHNA in July 2020 for the Sixth Cycle Housing Element, which covers an eight-year planning period (April 2021 through April 2029) and addresses housing issues that are related to future growth in the region. The housing allocation targets are not building requirements, but goals for each community to accommodate through appropriate planning policies and land use regulations. Allocation targets are intended to ensure that adequate sites and zoning are made available to address anticipated housing demand during the planning period.

Escondido’s share of regional future housing needs is a total of 9,607 new units for the period of April 15, 2021, to April 15, 2029; it is the third highest allocation in the SANDAG region. This allocation is divided into various income categories, as shown in Table 49. The RHNA was distributed to jurisdictions in the region using a formula that accounted for access to public transit and employment. The RHNA also includes a fair share adjustment, which allocates future need by each income category in a way that meets the State mandate to reduce the overconcentration of lower-income households in one community.

Table 49: RHNA Allocation by Household Income (2021-2029)

Above Moderate	Moderate	Low	Very Low	Total
4,967	1,527	1,249	1,864	9,607

Note: The City has a RHNA allocation of 1,864 very low income units (inclusive of extremely low income units). Pursuant to State law (AB 2634), the City must project the number of extremely low income housing needs based on Census income distribution or assume 50% of the very low income units as extremely low. Therefore, the City’s very low income RHNA is split into 932 extremely low and 932 very low income units. However, for the purpose of identifying adequate sites for the RHNA, no separating accounting is required.

B. Credits Toward RHNA

Housing units that are approved, under construction, or developed with building permits issued after June 30, 2020, can be credited toward this Sixth Cycle RHNA. Table 50 summarizes these particular units. Many of these units were achieved through recycling of existing lower-intensity uses in the Downtown and South Centre City Specific Plan areas; some are in single-family subdivisions in more suburban/rural areas of the City.



Table 50: Credits Toward RHNA				
Credits toward RHNA	Above Moderate	Moderate Income	Low Income	Total
Approved	1,002	90	155	1,247
Entitled or Under Construction (permitted after July 1, 2020)	355	0	0	355
Projects in Review	649	0	371	1,020
Total	2,006	90	526	2,622

Entitled Units

A project converting a vacant golf course began construction prior to July 1, 2020. The project is entitled for 380 total units, and in May 2020 received building permits for 25 units, including model homes. A total of entitled 355 units remain unpermitted as of July 1, 2020, but have since obtained permits or will obtain permits and will begin construction during the Sixth Cycle RHNA planning period. All of these units are expected to be affordable to above moderate-income households (see Table A-1 in Appendix A).

Approved Units

Projects that were approved but had not been issued building permits prior to July 1, 2020, are included in the RHNA as credits. The list of approved projects is included in Table A-2 in Appendix A: RHNA Credits. In total, the City has approved 1,247 units (1,002 above moderate units, 90 moderate income units, and 155 low income units) units, which are expected to be constructed during the Sixth Cycle planning period.

Units Undergoing Entitlement

In addition to projects that have already been approved, the City is currently processing entitlements for another 1,020 units, including 371 units expected to be affordable for low income households. The City anticipates that these units will be approved and constructed during the Sixth Cycle planning period. The list of projects undergoing review is included in Table A-3 in Appendix A: RHNA Credits. Regardless of planned densities, these projects are counted toward the RHNA based on the income/affordability levels proposed by the projects.

C. Development Trends, Yields, and Realistic Capacity for Housing

Much of the future development in Escondido is expected to occur with Downtown Escondido and in the East Valley areas. The Downtown, South Centre City, and East Valley areas of Escondido are characterized by a variety of underutilized commercial development and lower-intensity residential uses. Recognizing the need for additional housing and commercial employment opportunities, the City Council has adopted or is preparing specific plans for each of these areas to attract investment and encourage the production of housing for all income levels. Recently constructed or approved projects demonstrate the potential and likelihood that these areas will continue to see increased levels of

housing production at and, with density bonuses for inclusion of affordable housing, above the maximum density allowed under zoning.

Very High Density (75-100 du/ac)

Escondido's Downtown Specific Plan was amended in 2012 to allow for residential densities of up to 75 and 100 dwelling units per acre (du/ac) through a majority of the planning area. In recent years, developers have pursued various projects in very high-density areas, including projects that incorporated commercial/mixed use components as well as affordable and market-rate housing. A review of 14 recent projects found that developments in areas allowing 75 and 100 du/ac had an average residential yield of 80% of the maximum allowed. These trends clearly illustrate that the very high-density residential and mixed use zoning in Escondido's Downtown are actively incentivizing residential production at a variety of income levels.

While some of these recent projects were exclusively residential, the City identified nine different mixed-use projects built or proposed on sites with densities of 75 or 100 du/ac. These sites had an average yield of 69% of the maximum. Additionally, one of these projects is a statistical outlier, as it was a small commercial project that included a single unit. Generally, mixed-use developments have trended towards larger projects, and with the single outlier excluded, achieved an average yield of 77% of the maximum allowed on very-high density sites. The City Council has authorized the Community Development Department to remove mandatory ground floor commercial requirements from the Downtown Specific Plan. This action is anticipated to be completed in 2021. While the City is already experiencing high development yields in mixed-use projects and zones, the greater zoning flexibility will provide additional opportunities for residential development in Downtown, and likely increase densities beyond historic trends.

Medium-High Density (12-45 du/ac)

The City allows for housing at 12 to 45 du/ac throughout most of the South Centre City Specific Plan, portions of the Downtown Specific Plan, and in R-2 through R-5 zones throughout the City. Developments at these densities have consisted of mixed-use apartment complexes, affordable housing, and compact townhomes. A review of 15 recent and proposed projects illustrates that many developments are taking advantage of density bonuses and are achieving densities greater than the maximum permitted by the underlying zoning. On average, projects in this density range have been built close to or above the maximum allowed.

The single mixed-use project located in a zone allowing up to 30 du/ac achieved a density of 90% of the maximum allowed by zoning. While the City does not typically require mixed-use development at these densities, and is removing ground floor commercial requirements from the Downtown Specific Plan, the single mixed-use project illustrates that mixed-uses at these densities is feasible and likely to yield close to the maximum residential units allowed.



Lower Density Residential (0-11 du/ac)

The City has approved or is processing a number of lower-density, single-family subdivisions. A review of 24 of these projects found that these properties are developing at approximately 79% of the maximum allowable densities.

Affordable Housing Development

Escondido has seen substantial growth in the affordable housing stock of its Downtown area in recent years, with multiple developments taking advantage of density bonuses to construct additional lower income housing. A review of the recent and proposed affordable housing projects shows that affordable housing developments average approximately 114% of the maximum units allowed by the underlying zoning. This average is skewed down by a single, low-density suburban development that is affordable to seniors, which yielded only 62% of the maximum allowed. Multi-family projects with affordable housing have an average yield of 124% of the maximum allowed by zoning, and have been constructed in zones allowing between 12 and 100 du/ac. Furthermore, affordable housing has been constructed on non-vacant lands, with previous uses including warehouses, small medical facilities, single-family homes, and arterial commercial centers.

Based on recent affordable housing development in the City, it is reasonably expected that new affordable housing will continue to utilize density bonuses and construct more units than the base zone would otherwise permit.

Table 51: Affordable Housing Yields

Project	Description	Size (Acres)	Zoning Density	Yield %
SUB 20-0002 - Habitat for Humanity	10 condos at 245 E. El Norte	0.57	12	147%
ADM 20-0136 - 664 N. Fig Street	15 apartment units	0.59	18	140%
PHG 15-0009 - Solutions for Change Housing	33 affordable units & 1,120 SF commercial	0.79	30	140%
PHG 14-0020 - Veterans Village	48 new units (54 total) + 1,500 SF commercial on 1.8 ac.	1.76	30	91%
ADM 20-0070 - 337 E. Valley Pkwy	50-unit affordable housing	0.57	75	118%
Touchstone – Ivy	4 story, 95 new units	1.04	75	122%
PHG13-0010 - Meadowbrook	66-unit senior units	24.38	4.36	62%
PHG 17-0028 - Quince Senior Housing	145-unit affordable senior housing	1.48	100	98%

Source: Escondido Major Development Project Processing List, August 2020.

Small Lot Development and Lot Consolidation

State law requires that sites used to accommodate lower incomes be between 0.5 and 10 acres. Escondido's Downtown core generally consists of smaller lots that do not meet the 0.5-acre minimum. Many of the smaller lots meet the intent of the HCD eligibility guidelines. The density allows projects of 15 or more units on each site, which enables incorporation of affordable housing. The very high densities also create a strong incentive to consolidate smaller parcels. Escondido has

many small parcels and consolidation for redevelopment is very common. The City has seen multiple examples of developers assembling and consolidating smaller lots to create a larger overall project site. The Touchstone - Ivy project at 343 E. 2nd Avenue, which is being developed for fully affordable housing, involved the assemblage of six different parcels that were previously developed for a large medical office building (Escondido Surgery Center). The building construction was expensive frame on podium over parking and the site had a very low land-to-improvement ratio of 0.37, demonstrating that the permitted residential density can make consolidation and development of expensive non-vacant sites viable, when the existing uses are no longer viable. The 1.0-acre site has since been purchased by an affordable housing developer that is proposing 95 affordable units (95 du/ac). The Iwashita Apartments at 322 South Escondido Boulevard involves the consolidation of seven lots with different ownership to construct the 172-unit 6-story mixed-use apartment complex on a total of 1.28 acres (134 du/ac). The existing lots are between 0.16 acre and 0.32 acre, with previous uses including used car sales, single-family homes, and small medical offices, with land to improvement ratios above 1. Another project at 829 South Escondido Boulevard involves redevelopment of a 1-story small strip commercial building complex on three lots, with sizes ranging from 0.16 acre to 0.32 acre, being consolidated to allow for a 70-unit apartment complex on 0.66 acres (106 du/ac), with half of the units reserved for lower income housing. The three parcels have land to improvement ratios both above and below one (depending on the parcel), illustrating that properties with low existing improvements and high net unit potential are exhibiting trends of redevelopment.

The City has seen many other examples of parcels that have been consolidated to provide a larger site for a housing development. Veterans Village, along South Escondido Blvd. and W. 15th Avenue consolidated six parcels, including several smaller than 0.5 acres, to build 54-unit affordable apartments on 1.8 acres (30 du/ac) for veterans and their families. Another affordable housing project, Valley Seniors Village at the corner of Valley Parkway and Ivy Street (337 E. Valley Parkway), aggregated five extremely small lots (each less than 0.2 acres) to provide a 0.41-acre site for a proposed mixed-use building with 20 units (49 du/ac). Finally, four existing single-family home lots are proposed to be consolidated to create a 1.0-acre site for a 44-unit (44 du/ac) apartment complex at the corner of South Escondido Boulevard and Vermont Avenue in the South Centre City Specific Plan. These recent and proposed projects provide direct evidence that lot consolidation is common and feasible in Escondido and is not a significant constraint, even when providing affordable housing. Lot consolidation for parcels smaller than 0.5 acres has been used frequently and contributed to multiple affordable housing projects. Therefore, the City expects this trend to continue throughout the sixth cycle and is accounting for lot-consolidation when projecting for the number of potential low-income sites within the sites inventory.

These examples of consolidation of small lots into larger sites for redevelopment are common and the characteristics of the parcels in these examples are typical of the proposed RHNA sites in terms of location, existing or prior land uses, lot size, land-to-improvement ratios, and permitted development density. Additional examples of these RHNA site typologies and recent redevelopment projects with similar characteristics are provided in Appendix B, Sites Inventory. The list of sites

includes land use, improvement to land value ratios, age of structures, and the number of units that could be added to a property to help demonstrate the viability of each parcel.

State law requires that sites used to accommodate lower-income RHNA units be between 0.5 and 10 acres. Based on the recent trends of lot consolidation for housing projects, including affordable projects, the City considered adjacent parcels with a cumulative size above 0.5 acres as able to accommodate lower-income units. All properties included for lower-income units either have individual sizes between 0.5 and 10 acres, or cumulative/consolidated sizes between 0.5 and 10 acres. Sites that otherwise would be eligible for lower-income units but that did not meet the size requirement were deemed appropriate for moderate income households. The City is proposing a program to evaluate incentives to help identify, promote and facilitate lot consolidation and development on small lots.

Realistic Capacity and Development Likelihood Calculations

Based on the recent Specific Plan Amendments spurring housing development in the Downtown, South Centre City, and semi-rural areas, there is a strong likelihood that developers will continue to invest in Escondido during the Sixth Cycle planning period. While recent project trends demonstrate the feasibility and likelihood that developers will continue to build at and above the allowed density, the City recognizes that some projects may not be constructed to their maximum potential, or otherwise may not be constructed during the planning period. In response, the City has adjusted its assumptions with respect to the realistic and expected development potential. As explained below, the methodology for projecting the development potential and likely project yields for the proposed East Valley Specific Plan ("EVSP") differ from those used for the South Centre City and Downtown Specific Plan areas.

East Valley Specific Plan

The EVSP contains mechanisms to ensure that developers build close to the site's maximum potential. For the mixed use and urban residential districts, the plan sets both minimum densities and a target production point ("TPP"). Applicants are encouraged to meet and exceed the TPP; in cases where they develop below the TPP, the applicant is required to pay an in-lieu fee. Based on the EVSP's strong incentives for developing at and above the TPP, site capacity in the EVSP was calculated by multiplying the TPP density by the site acreage, and did not include any additional downward adjustments. The TPP densities shown in Table 52 were utilized when calculating residential potential in the East Valley plan area.

It is important to note that the EVSP also is establishing a Density Transfer Program ("DTP") to enable the City to transfer densities from undeveloped or underutilized properties (i.e. sending areas) within the EVSP to developing properties (i.e. receiving areas). The program would increase the probability that the anticipated number of dwelling units in the EVSP area could actually be achieved by allowing a developing property to increase its density beyond what current zoning would permit when other properties have underdeveloped to less than the maximum density. The transfer density would be held in a Density Credit Pool until assigned to a particular development project. The EVSP



DTP establishes a creative land use strategy reflective of changing needs, resources, and conditions to maintain flexible land use management and to encourage the full build-out of the East Valley area. The EVSP DTP is an optional program - and would allow property owners to re-assign or transfer units only if they wanted to. That is, if a property owner chooses to not maximize their development rights and build-out their site to its full potential, the EVSP DTP allows for the transfer or remaining and unused housing density to another, future project in the EVSP area.

Land Use Designation	Applicable Zoning	Minimum Density (du/ac)	Maximum Density (du/ac)	Target Production Point
Urban IV/V	R-5-30	21	30	25
Mixed Use	M-U	20	80	45

Note: Nonresidential zones of the EVSP were not considered for housing production.
 Source: EVSP Draft Land-Use Scenarios

Areas Outside of the East Valley Specific Plan

RHNA sites located outside the EVSP area are not subject to a TPP, so an alternative method of determining site capacity and development likelihood was used. As noted above, project trends generally indicate that housing throughout the City is being built near the maximum allowed density, and for affordable projects, above the maximum allowed density. While recent production trends indicate that site capacity could reasonably be estimated at the maximum density allowed by zoning, some developments will likely be built at lower densities. Additionally, some of the identified sites may not be developed during the Sixth Cycle planning period, further necessitating a downward adjustment for the realistic capacity. Due to these considerations, the City is estimating that properties with densities of 0 to 45 du/ac will be built to 75% of their maximum allowed, while properties with densities between 46 and 100 du/ac may achieve 50% of the maximum allowed by the underlying regulations. Recent trends suggest that this assumption is highly conservative, and significantly underestimates the number of units that are likely to be constructed on these very high density sites during the planning period.

Density Range (du/ac)	Assumed Capacity Factor
0-45	75%
46-100	50%

Property Yield Calculation

The acreage of the property is multiplied by the allowed density and the yield factor to establish the likely number of units that the site could accommodate. This "estimated yield" was then rounded to the nearest integer. The number of existing units (based on 2020 Assessor data) is subtracted from the likely yield to get the number of "net new units" per parcel.



$$\text{Estimated Yield} = \text{size (acreage)} * \text{density (du/ac)} * \text{Assumed Capacity Factor}$$

$$\text{Rounded Yield} = \text{Estimated Yield rounded to nearest whole number}$$

$$\text{Net Units} = \text{Rounded Yield} - \text{Existing Units}$$

D. Density and Affordability Levels

State law (Assembly Bill 2342/Government Code 65583.2) uses allowed density as a proxy for income/affordability for the sites inventory. Depending on the size and urbanization of the jurisdiction, different default densities are presumed to support lower-income units. Escondido is classified as a "jurisdiction in a metropolitan county," which has a default density threshold of 30 du/ac for lower-income units.

Generally, single-family homes (0-11 du/ac) are presumed to be affordable to above moderate income households, while townhomes and garden-style apartments (12-29 du/ac) are presumed to be affordable to moderate income households. Properties with densities at 30 du/ac or greater are presumed to be suitable for both low and very low income units per AB 2342. Higher-density properties are also anticipated to be able to support both moderate- and above moderate-income households. All lower-income sites identified in the sites inventory have allowed densities of 30 du/ac or greater.

Table 54: Affordability by Density

Income	Density Range (du/ac)
Above Moderate	0-11
Moderate	12-29
Low	30+
Very Low	30+

E. Methodology for Identifying Sites to Accommodate the RHNA

The City of Escondido has few vacant parcels suitable for residential development, particularly in areas proposed for higher-density housing. The City's comprehensive General Plan update in 2012, along with updates to the Downtown and South Centre City Specific Plans, focus new residential growth into Escondido's downtown and urbanized core, an area with excellent access to transit, services, employment, and amenities. Due to the complexity of assessing the City's thousands of parcels for redevelopment suitability and likelihood, a comprehensive GIS-based analysis was used to identify underutilized sites across the City that are considered likely to redevelop within the Sixth Cycle. Sites that were included are generally free of environmental constraints and have existing structures and uses that will likely be replaced and redeveloped for housing. Such conditions include large parking areas, older buildings, marginally operating businesses, nonconforming uses, and a capacity for a substantial increase in dwelling units.

General Assumptions

Constraints

Properties with constraints that may preclude development, such as on-site historic structures or being on conserved lands or agricultural preserves, were removed from consideration for the sites inventory.

The City also evaluated the potential for Floodplains to act as a constraint on housing production, particularly in Downtown Escondido and the EVSP. The City currently allows the same development in its 100-Year Floodplain as is allowed in the underlying zoning. While housing projects in the floodplain may require different engineering and construction methods, recent projects have demonstrated that this was not a constraint. For example, the Quince Street Senior Housing, a 145-unit affordable housing project, achieved a density of 100 du/ac in the floodplain. Based on the City's standards and recent projects, no additional capacity deduction was implemented in the 100-year floodplain.

Sites within the 100-year floodway (the main channel of flowing water as opposed to the floodplain) are excluded from the sites inventory.

Major Developments and Building Permits

Any parcels that are/were part of a major development or had new commercial or residential building permits issued since 2013 were removed from consideration, as the recent construction would be presumed to be a constraint on near-term redevelopment.

Existing Land Use

The existing use of a property can create a significant constraint for redevelopment. The City used SANDAG Series 14 Land-Use information to determine the existing use of a property. Sites with the following existing land uses were removed from consideration for the sites inventory:

- Cemetery
- Elementary Schools
- Police/Fire Station
- Jr. College
- Jr. High School
- Dumps/Landfills
- Lakes/Reservoir/Large Pond
- Landscape Open Space (often HOA Lots)
- Mobile Home Park
- Multi-Family Residential
- Open-Space Parks/Preserves
- Other Group Quarter Facilities (Congregate Homes/Dorms/etc.)
- Other Transportation Features
- Other University/College
- Railroad Right of Way
- Residential Under Construction
- Road Right of Way
- School Under Construction
- Senior High School

Methods for Identifying Suitable Underutilized/Non-Vacant Sites

The vast majority of the sites with General Plan land use designations and zoning for high-density residential development are in older, urbanized areas that are largely developed or used to some degree. There are very few vacant sites in such areas. The following section summarizes the methods used for identifying suitable underutilized, or non-vacant, sites.

Land to Improvement Value Ratio

Based on County Assessor provided data, the land to improvement ratio for each parcel was calculated by dividing the assessed land value by the assessed improvement value. A high ratio (1.0 or above) illustrates that the land is more valuable than the improvements on the land, and that the site is likely appropriate for redevelopment due to the low relative value of existing structures. Properties with land to improvement ratios above 1.0 are considered underutilized and were presumed to have improvements that would not constrain the site for the redevelopment of housing and were included in the inventory. A review of several recent projects (discussed in the Development Trends section above) showed that many properties that were recently redeveloped had land to improvement ratios above 1. While the recent history is not comprehensive, it does illustrate that using the land to improvement value ratio can identify sites that are likely to be redeveloped during the planning period. Despite this, the City did experience several instances of redevelopment where the previous land to improvement ratio was below one, indicating more substantial and valuable structures while the existing uses are no longer viable.

In many instances, the land to improvement value of a property does not fully capture the site conditions indicating suitability for redevelopment. Therefore, the sites inventory also includes properties with land to improvement values below 1.0, provided that both of the following conditions are met:

- Existing structures are more than 31 years old; and
- The assumed project yield (after deductions of 50% or 25%) are at least five times the number of existing units on the site.

Properties that had no residential units and land to improvement ratios less than 1.0 were included provided the structures were more than 31 years old and the net new units ratio is above 5, based on the assumption that the permitted residential density will continue to provide a strong incentive for redevelopment. These requirements are described further below.

Building Age

County Assessor data was used to identify the age of structures throughout the City. For sites with land to improvement ratios below 1.0 (indicating that the improvement is more valuable than the land), the existing improvements must be at least 31 years old, an age which indicates that they may be suitable for redevelopment as the natural lifespan of the building ends. The age criteria filters out newer buildings with substantial improvements that may still be considered otherwise underutilized based on the potential for residential development.

Additionally, most of the City's recent development occurred on buildings that were built prior to 1990. For example, the Touchstone Ivy apartments were constructed on a building that appears to have been built during the 1970s or 1980s based on a review of street view imagery (assessor's data was not available). The warehouses that were redeveloped for senior affordable housing (Quince Street Senior Homes) were constructed in the early 1960s.

Other existing single-family and commercial buildings at 322 S. Escondido Boulevard and 829. South Escondido Boulevard (proposed housing projects) were built from the 1920s to 1960s. Another building that is a part of the 829 S. Escondido Boulevard project was built in 1990, illustrating that even buildings constructed more recently are suitable and likely to be developed, provided that the underlying zoning allows enough capacity for profitable residential development.

Net New Units Ratio

Only properties that could potentially add five or more times the existing units on a property were considered for properties with land to improvement ratios below 1.0. Properties with no residential units (commercial, mixed-use, industrial) were also included due to high demand for residential and the potential for recycling existing commercial uses. These types of properties, including existing buildings with substantial vacancies or occupancy, are underutilized in comparison to the intended and permitted intensity and density allowed by zoning. The underlying potential of these prospective new units is anticipated to act as a catalyst for housing development.

Despite much of the City's recent development occurring on underutilized commercial properties, residential recycling has occurred on single-family properties throughout the Downtown and Southern Centre City Specific Plans. For example, a project at 350 West 10th Street is converting two single-family homes into an 8-unit apartment building (a net new unit ratio of 4). The 322 S. Escondido project proposes 172 units on a site that contains 4 single family homes and commercial

building (new unit ratio of 43). Another project at 664 N. Fig Street proposes 15 apartments on a single-family lot (new unit ratio of 15). These projects, with net new unit ratios ranging from 4 to 43 demonstrate the validity of using this ratio in combination with building ages to identify underutilized parcels that are likely to be redeveloped during the 6th Cycle.

Adjacent Parcels

Individually, some specific parcels may not be considered underutilized or likely to redevelop in the near future. However, contiguous parcels that are considered together may present a stronger redevelopment potential; these may include individual parcels that contain viable uses but serve to connect the vacant and underutilized properties. Section C above describes several projects that have been proposed or approved for small, contiguous lots in the Downtown and South Centre City areas. For this reason, some adjacent properties that may not individually meet the criteria listed above were included in the sites inventory.

Appendix B, Sites Inventory list includes improvement to land value ratios, age of structures, land use, and the number of units that could be added to a property to help demonstrate the viability of each parcel. As discussed above, each parcel that was included meets criteria indicating that it is physically underutilized (land to improvement ratio above 1) or underutilized relative to the zoning (net new units ratio \geq 5; older structure). These conditions provide evidence that the properties are likely to be redeveloped for housing during the planning period.

Infrastructure

The City of Escondido operates water and wastewater utilities throughout the City, except for a few areas that are served by Rincon del Diablo Municipal Water District. The City actively participates in regional water management and maintains active capital improvement programs to improve water and wastewater infrastructure throughout the City.

The sites selected all have access to existing water and sewer infrastructure. In some areas, the City's existing infrastructure may need to be upgraded to accommodate the projected housing units specified in the sites inventory. The City will continue to update and evaluate infrastructure needs and include the appropriate infrastructure programs in the relevant capital improvement plan.

The City is served by San Diego Gas & Electric ("SDG&E") and a variety of telecom providers. SDG&E service and broadband internet access are available across the City and for all sites identified in the inventory.

Ownership

Properties that are owned by the common interests (e.g., homeowners associations) were removed based on the "Owner Name" assessor's data. Parcels owned by the City of Escondido, special districts, and SDG&E were also removed from consideration.⁸

⁸ Vacant parcel 230-141-01-00 owned by the City of Escondido is included.

F. Sites Inventory and Residential Development Potential

The City is planning to accommodate new housing primarily through infill development on non-vacant sites. Prioritizing infill and densification, particularly in the City's Downtown and transit rich neighborhoods, will minimize sprawl and focus new development in an efficient and environmentally sensitive manner. Overall, the City is accommodating 93.7% (8,117 units) of its RHNA capacity on non-vacant sites, and 6.3% (546 units) on vacant sites. Of the lower-income capacity met through identified sites, only 3.1% (135 units) of the lower-income capacity is met through vacant sites.

The City also identified 653 units of lower-income housing that can be accommodated by approved projects, pending projects, and ADUs. Combined with the units located on vacant sites, the City can accommodate 25% (788 units) of its lower income RHNA (3,113 units) on sites without existing uses. As these vacant or approved units do not exceed 50% of the lower-income RHNA, the City, based on substantial evidence, makes the required finding that the non-vacant sites are likely to be redeveloped for housing during the planning period.

Downtown Specific Plan Area

In 1992, the City identified Downtown Escondido as an area in need of concentrated revitalization efforts and adopted the Downtown Revitalization Area Specific Plan. The plan has undergone several revisions and was last updated in 2012. The 2012 amendment rezoned a majority of Escondido's Downtown to accommodate high-density residential and mixed-uses. While some properties in downtown Escondido are reserved for commercial development, residential and mixed-use development at densities of 45 to 100 du/ac are allowed throughout most of the specific planning area.

Through the incentives and flexibility offered by the Downtown Specific Plan, the City has experienced a steady pace of redevelopment activities in the area, such as aging commercial developments, older single-family or small multifamily homes, or parking lots being recycled into higher intensity developments. These projects are frequently built to the maximum allowable density, demonstrating the feasibility of achieving the substantial residential production envisioned by the City.

Overall, vacant and underutilized properties in the Downtown Area can accommodate 4,090 new units. This estimate is based on the highly conservative yield adjustments (e.g., 50% to 75% of the maximum) shown in Table 53.

Non-Vacant Redevelopment Site Typologies

The Downtown Specific Plan area includes approximately 275 parcels and 65 consolidated non-vacant inventory sites. The Downtown area contains several subareas that each include a variety of building patterns and typologies described below. The typology of each site is identified in the sites inventory list. The list also identifies the land-to-improvement value ratios, age of structures, land use, and the number of units that could be added to a property to help demonstrate the viability of each parcel. See Figure B-1 following Appendix B, Sites Inventory for examples of existing non-vacant sites exhibiting characteristics of recent multifamily redevelopment in the area. Figure B includes

images of over 50 examples from the sites inventory including strip commercial, office/medical, single-family residential, industrial/warehouse, and church uses. It also includes examples of eight recent redevelopment projects on sites with similar characteristics as the inventory sites including uses, age of structures, land-to-improvement assessed value ratios, zoning, density, and development potential.

North of Escondido Creek

The area generally north of Escondido Creek and between North Escondido Boulevard and North Broadway includes about 35 parcels and eight consolidated inventory sites. Existing uses include neighborhood strip shopping centers with large parking lots, small and free-stranding arterial strip commercial buildings on small lots, a few small medical and professional office buildings, and a few light industrial buildings. Uses include medical office, auto parts, service and tire stores, grocery stores, vacant office buildings, a Goodwill donation center, fast food restaurants, and a laundromat. This entire area is zoned for the City's highest density residential and mixed use at densities up to 100 dwelling units per acre. Most of the parcels in this area are contiguous and create excellent individual and consolidated development sites. This area is expected to experience significant residential and mixed-use redevelopment over the next eight years. Two recent 4- and 6-story multi-family residential communities (Alcove and Latitude 33) directly west of the main block of sites demonstrate the trend for redevelopment in the area on sites with similar characteristics.

South of Escondido Creek

The area south of Escondido Creek and West Valley Parkway includes approximately 65 parcels and 14 consolidated sites that include a mix of older strip commercial buildings, a block of auto sales, parts and repair uses, and several blocks of a mix of older small single-family homes interspersed with vacant land and parking lots. Several of office and larger buildings are vacant. The area is designated for 75 dwelling units per acre. The new Touchstone Ivy multi-family project reflects the trend toward new multifamily in the area and demonstrates the high likelihood that the proposed sites will be redeveloped within the next eight years.

West of Former Palomar Medical Center

The 9-block area immediately west of the Palomar Medical Center includes approximately 80 parcels and 16 consolidated sites. The area is characterized by small mostly one-story buildings. There are a few two-story buildings. Most are set close to the sidewalk and are adjacent to each other where parking in front of the buildings is on-street and private parking is provided behind the buildings. Some have no parking at all which limits their marketability and development potential. There are two 1-story larger floorplate buildings on the western end of the area. Both are vacant. There are four new residential development projects including the Touchstone Ivy, Touchstone Aspire, and a mixed use project including 50 units of affordable housing. This area exhibits the same characteristics as the nearby redevelopment sites. It is ripe for redevelopment within the next eight years with high density mixed-use development that takes advantage of the 75 dwelling units per acre permitted density and redevelopment vision of the Downtown Specific Plan.

Southern Downtown Specific Plan

The 15-block area that forms the southern portion of the Downtown Specific Plan is located between East 2nd Avenue and 5th Avenue and Centre City Parkway and Ivy Street. The area includes approximately 75 parcels and 22 consolidated sites. Approximately half of the sites are designated for 45 dwelling units per acre. These sites are located between Broadway and Ivy and 2nd and 5th Avenues. The buildings in this area are primarily one-story medical/professional office buildings and older single-family homes, and large parking lots. The other half of the inventory sites are zone for 75 dwelling units per acre (between 2nd and 3rd Avenues) and 100 dwelling units per acre (between Centre City Parkway and Maple Avenue). The area includes single-family dwellings, the Escondido Lumber Yard, a one-story office complex, a used-car dealership, a vacant office building and parking lot, a mortuary, and several older, small, one-story medical office buildings. There is a larger floor-plate 2-story office building and very large parking lot and three single family buildings between Juniper and Ivy street near the former Palomar Medical Center that make a very attractive redevelopment site. This site and most of the other office buildings are exhibiting increased vacancies and most have for lease signs. This complex is directly south of a new multifamily project on Ivy Street. The site was occupied by one of the larger and more expensive buildings in the area – the Escondido Surgery Center was a multi-story podium building with a 2-level parking structure that covered three-quarters of the block. Redevelopment of this site demonstrates the strength and feasibility of redevelopment of even higher cost sites. The loss of the Palomar Medical Center is expected to greatly diminish the near-term and long-term market and viability for the clusters of outpatient and small medical office support services in the area. The uses in this area are expected to redevelop over the next eight years as a result of the very strong demand for residential development, the significantly increased very high density development potential and the weakening market and demand for medical and professional office space.

Escondido Transit Center

The Escondido Transit Center and surrounding area includes 18 parcels and consolidated 4 sites. The inventory sites include mostly one-story office buildings, and several older warehouse buildings and large parking lots. There is a 3-story office building that is also included because the and very large surface parking lot makes it a very attractive large site for mixed-use infill or redevelopment. This area has been upzoned to 100 dwelling units per acre and has attracted recent redevelopment activity. The 6-story Rowan apartment homes community was recently developed on the site of a relatively large 2-story office building. The 145-unit Quince Street affordable Senior Housing project was recently approved. The inventory sites have the same favorable characteristics as those that are recently redeveloped and are expected to be developed in the next eight years. The Transit Center is a great asset to support the high density development but is also a prime candidate for infill development. North County Transit Center proposed a concept plan for developing the site with 400+ multi-family units, retail, office and parking. Formal plans have not been submitted. The permitted densities would support structured parking that would make large portions of the site available for truly transit-oriented residential and mixed-use.

South Centre City Specific Plan Area

The South Centre City Parkway Specific Plan covers a length of approximately 2.25 miles between 5th Avenue and Centre City Parkway and Verda Avenue. South Centre City is characterized by a variety of aging, underutilized, and small-scale commercial development, interspersed with older single-family residential uses. As a part of the City's comprehensive General Plan update in 2012, four smart growth "target areas" were identified in the South Centre City region: the South Quince Street Area, South Escondido Boulevard Area, Felicita Avenue Area, and Centre City Parkway Area. These target areas were aggregated in the 2018 South Centre City Parkway Specific Plan, which established a comprehensive planning vision for the district. The plan established many districts and subareas suitable for higher-density residential and mixed-uses. Since the adoption of the plan, the City has seen multiple residential projects from duplexes and small garden-style apartments to high-density, mixed-income projects proposed and constructed along this corridor—evidence that the recently up-zoned land has catalyzed residential development as planned.

The City identified a number of properties within the South Centre City Parkway Specific Plan area where the conditions of existing uses are conducive to future redevelopment. Such conditions include large parking areas, older buildings, marginally operating businesses, nonconforming uses, and capacity for additional units. Overall, the properties in South Centre City Parkway Specific Plan area are projected to accommodate 949 new units.

Non-Vacant Redevelopment Site Typologies

The South Centre City Specific Plan area includes approximately 150 parcels and 39 consolidated non-vacant inventory sites. The majority (116 parcels) are zoned for 30 dwelling units per acre. The 26 parcels along 9th Avenue are zoned for 24 dwelling units per acre, the 11 inventory sites along 5th Avenue are zoned for 100 units per acre. These sites are characterized by one of the four typologies described below. The typology of each site is identified in the sites inventory list. The list also identifies the land-to-improvement value ratios, age of structures, land use, and the number of units that could be added to a property to help demonstrate the viability of each parcel. See Figure B-1 following Appendix B, Sites Inventory for examples of existing non-vacant sites exhibiting characteristics of recent multifamily redevelopment in the area.

Old Single-Family Homes in High Density Zone

Approximately half (68 parcels and 20 consolidated sites) of the total proposed inventory in the South Center City Specific Plan area include older, small one-story single-family homes that are zoned for high density residential. Many of the homes are nearing the end of their useful service life. The large increase in development potential and the recent examples of redevelopment for high density residential on similar properties in the area is a very strong demonstration and incentive for redevelopment of these properties in the next eight year period.

Small Strip Commercial Buildings

The sites inventory includes approximately 55 sites that are characterized by small strip commercial buildings. Most of the commercial buildings in the South Center City specific plan area are old, small one-story single-family homes that have been converted decades ago to small commercial shops. Some were likely built as small commercial shops but have not been significantly improved for decades. Many are in poor condition. There is a high proportion of vacancies. Sites in the southern portion of the district include many more vacancies and buildings that are in poor condition. Several new multi-family developments in the vicinity along Escondido Boulevard demonstrate the redevelopment trend and feasibility. The large increase in development potential and the recent examples of redevelopment for high density residential on similar properties in the area is a very strong demonstration and incentive for redevelopment of these properties.

Small Medical/Professional Office Buildings/Complexes

There are about 14 sites with small one-story free-standing medical and professional or personal service office buildings in the South Center City Specific Plan. Some are converted single-family homes and are on streets that still contain older one-story single-family homes. Most are located along the southern portions of South Escondido Boulevard and are zoned for 30 units per acre. The proposed sites along 5th Avenue are near several new 3- and 4-story office and mixed-use buildings that demonstrate the redevelopment potential of these sites with very similar characteristics. The large increase in development potential of 30 to 100 units per acre and the recent examples of redevelopment for high density residential on similar properties in the area is a very strong demonstration and incentive for redevelopment of these properties.

Automotive (Gas Stations, Repair, Sales, Storage, Car wash)

There are about 14 automotive related sites that are in prime locations for residential and mixed-use redevelopment. Several of the proposed RHNA sites include small, older automotive uses including convenience stores, service stations, small repair shops, or towing/storage yards. These sites have small and generally very low value simple shell buildings. Several are located in the northern section of the district off 9th Avenue near Centre City Parkway. Permitted densities range from 24 to 100 dwelling units per acre. All are located within a few blocks of recent multi-family development projects. The large increase in development potential and the recent examples of redevelopment for high density residential on similar properties in the area is a very strong demonstration and incentive for redevelopment of these properties within the next eight years.

East Valley Specific Plan Area

The East Valley area of Escondido is directly east of downtown, centered on Valley Boulevard, and generally bounded by Escondido Creek to the north, Harding Street to the east, East Grand and East 2nd Street to the south, and North Hickory, South Hickory, and North Fig Street to the west. Due to previous zoning that largely precluded residential uses, existing uses consist primarily of strip commercial, big box retailers, and small medical and professional office uses. Many of the small

medical and professional office buildings are former single family homes that were converted to commercial use. The area is still frequently interspersed with older, small single family homes.

The EVSP is a policy and regulatory document being prepared to identify the future vision, goals, and policies and establish area-specific regulations to facilitate, guide, and incentivize the fulfillment of that vision. The overall purpose of the EVSP is to guide redevelopment of the underutilized residential and commercial land of low-intensity general retail, office, restaurants, and small-scale service businesses into a new neighborhood with a mix of residential, commercial, public, and open space uses. It would accommodate increased housing density along with other transit-supportive uses and improvements.

Through the plan, the City will redesignate and rezone most of the 191-acre area (127 acres excluding rights-of-way) from the current commercial and office uses to mixed-use and high-density residential through the Mixed Use and Urban Residential IV/V districts.

The new zoning will require that residential components be included in all redevelopments at the minimum densities illustrated in Table 52 and described below.

The Draft EVSP Land Use Plan shows limited and targeted areas for general commercial and mixed-use along both sides of the East Valley Parkway, and urban residential areas to the north and south of the mixed-use corridor. Two park overlay zones are proposed over the urban residential zones on the eastern half of the EVSP area. The development program includes:

1. General Commercial - approximately 7 acres and 60,000 square feet of exclusively commercial uses, including local-serving commercial, automobile service, eating/drinking establishments, entertainment facilities, retail, office, and service establishments intended for other commercial uses not suitable for residential zones.
2. Mixed-Use - approximately 70 acres with residential densities between 30 and 80 du/ac, averaging 45 du/ac for an estimated 4,600 units, and an estimated 700,000 square feet of retail, office and medical office space. Multifamily residential units, appropriate along major thoroughfares, would be proximate to shopping centers and commercial (retail/entertainment, community facilities and employment office/medical office) opportunities.
3. Urban Residential IV/V - approximately 50 acres of residential and mixed-use yielding approximately 1,500 dwelling units (multifamily residential units, town homes, apartments, flats and condominiums) between 21 and 30 du/ac and averaging 25 du/ac. This area is also projected to contain approximately 450,000 square feet of retail, office and medical office space at 15,000 square feet/acre.
4. Park Overlay Zone - two overlay zones over portions of the Urban Residential and Mixed-Use areas are intended to yield a minimum of 10 acres of active and passive parks as well as land to protect, maintain, and enhance the community's natural resources and include detention basins and creek corridors.

Only three intersections within the plan area are required to provide commercial frontage. These are along East Valley Parkway at Ash Street, Date Street, and Fig street. Because of the minimum density requirement, properties within these two districts will recycle as residential or mixed use.

Non-Vacant Redevelopment Site Typologies

There are just over 200 parcels and 47 non-vacant inventory consolidated sites within the East Valley Specific Plan area. They are characterized as one of the following typologies described further below – aging arterial strip commercial, and older, low-scale medical and professional office buildings. The typology of each site is identified in the sites inventory list. The list also identifies the land-to-improvement ratios, age of structures, land use, and the number of units that could be added to a property to help demonstrate the viability of each parcel. See Figure B-1 following Appendix B, Sites Inventory for examples of existing non-vacant sites exhibiting characteristics of recent multifamily redevelopment in the area.

Large and Small Arterial Strip Commercial

There are approximately 17 sites and 70 parcels located along the Valley Parkway arterial that meet the very restrictive eligible site selection criteria including parcel size, land to improvement ratio, minimum residential potential yields, and existing structures more than 31 years old.

The proposed sites east of North Ash Street include typical strip commercial centers on larger lots (five plus acres). These sites have large underutilized parking lots between the street and older one-story buildings, and some from-standing buildings often used for banks and restaurants, with little evidence of renovation or refurbishment. Uses include discount stores and small local independent shops. Sites that abut the Escondido Creek appear to have less activity and vitality than other commercial sites that are not isolated from the adjacent and surrounding communities. These sites are ripe for redevelopment with the addition of infill within the underutilized parking areas or in conjunction with the replacement of one or more of the strip or free-standing buildings with residential and mixed-use buildings. The continuing decline in demand for retail space and the increasing demand and extremely strong housing market make redevelopment of these sites likely during the next eight-year planning period. These sites exhibit the characteristics of similar sites in the area that have or are currently undergoing redevelopment.

The Valley Parkway area west of North Ash Street includes considerably older (1920s to 1960s), almost exclusively small one-story individual commercial buildings and small multi-tenant buildings on small lots. Sites include individual driveways and reflect a 50-foot wide lot pattern of lots. These small lots exhibit the characteristics of other sites consolidated for new redevelopment sites. The area includes some older single family homes. Uses include a mix of local service uses such as nail salons, pawn shops, small local fast food, and older medical and professional offices in small stand-alone buildings. Many of the buildings are in poor condition and lack maintenance. There are few new buildings or signs of any rehabilitation, capital investment, or renovation. Many buildings are vacant. The existing weak market and continuing decline in demand for these retail spaces and the increasing demand and extremely strong housing market make redevelopment of these sites likely

during the next eight year planning period. These sites exhibit the characteristics of similar sites in the area that have or are currently undergoing redevelopment.

Small Medical/Professional Office Buildings/Complexes

The 15-block area east of the former Palomar Medical Center includes approximately 29 sites and 100 parcels that meet the very restrictive selection criteria including parcel size, land to improvement ratio, minimum residential potential yields, and existing structures more than 31 years old. The area is characterized by older, underutilized 1-2 story medical offices and small complexes with frequent vacancies and for lease signs. Many of the buildings are converted single-family residences. Occasional single family homes remain within and amongst the small medical, dental and professional offices. These uses have developed around the Palomar Medical Center which has been decommissioned and is being redeveloped as a residential community. The loss of this facility will remove a major source of business for these small offices. Vacancies and relocations have already increased and become more apparent. It is likely that many of these uses will decline and relocate over time to be nearer to other medical centers. The combined loss of the Palomar Medical center, the proposed redevelopment plan and rezoning of the East Valley Specific Plan and the extremely strong demand for housing will result in the very high likelihood that these sites will experience significant redevelopment in the next eight year period. These sites exhibit the characteristics of similar sites in the area that have or are currently undergoing redevelopment.

Overall, the City is anticipating approximately 6,100 residential units once the planning area is built out. Recognizing that not all of the upzoned properties are underutilized or likely to develop within the planning period, only 2,343 units are being counted towards the Sixth Cycle sites inventory. However, even though this analysis supports a realistic, residential-capacity assumption for the 2021-2029 Housing Element cycle, the City will proactively monitor housing production in the planning area and determine to the extent that the EVSP inventory can accommodate a larger portion of its share of the regional housing need by income level during future planning periods, pursuant to Government Code section 65584. Furthermore, future inventories will consider the impact of the TPP and EVSP DTP on development yields when calculating realistic development capacity.

General Retail and Office Trends Support More Residential and Mixed-Use

Most cities have more commercial space than can be readily supported. While not limited to California, many cities have over-zoned, and in many cases overbuilt commercial space as a means of capturing sales tax revenue. The excess space has been a problem for decades resulting in vacancies, soft markets, low rents, and often physical decline of the properties. This decline in the demand for retail space has been further accelerated and exacerbated for over 10 years with the increasing popularity and market share of on-line retail sales. On-line sales and services have been expanding into areas thought impossible just a couple of years ago. This includes even the sale of cars and homes entirely on-line.

There is a strong and growing trend as a result. Many malls, big box centers, and community shopping centers are being reconfigured, reoriented and redeveloped to include residential, entertainment, open space and recreation that increases overall population and occupancy on the properties around the clock. This provides support for the commercial uses and increases the overall utilization and profit. Many of the big box retail stores are being converted to fulfillment centers where online purchase orders are pre-packed and the customer simply picks up their goods. No shopping occurs within the spaces. Developers have recognized this trend for years. While some malls and shopping centers will remain and be upgraded, developers and investors are not planning on building new 100% commercial developments. Most are planning for only mixed-use projects. Recycling of similar properties is occurring throughout the region. Redevelopment of commercial properties do not always involve the discontinuation of existing uses. Many sites have large, underutilized surface parking lots that can be repurposed for additional infill development.

These long-term trends have been accelerated and amplified by the COVID-19 pandemic. In addition to pushing more retail sales to online, the stay at home quarantine and office closures have proven the feasibility and efficiency of remote working. This has shuttered many office buildings temporarily. Many companies have gone entirely virtual and have permanently relinquished office spaces. While some recovery is expected in the office markets, most companies are expecting and planning for reduced in-office occupancy. This has and is expected to increase vacancies and exacerbate the retail/office markets that were already in decline. Together, these trends provide increased opportunity and likelihood that many of the existing commercial and office properties throughout Escondido will be converted to residential use in the near and foreseeable future.

Lower Density/ Non-Specific Plan Residential Areas

Other parts of the City can accommodate units for moderate-income and above moderate-income households. There are over 300 sites in the inventory with densities up to 24 units per acre. the vast majority (285) of these potential units are located on underutilized single-family (205), vacant and underdeveloped (72), and agricultural uses (10). About 1,281 units are anticipated for these lower-density regions of the City.

Accessory Dwelling Units

Since recent changes to state accessory dwelling unit ("ADU") law, Escondido has seen a large increase in the number of ADUs constructed each year. Since 2017, the City has also tracked ADU rental prices based on information provided on applications, allowing for ADUs to be projected by income for the Sixth Cycle based on the average production. The City permitted 25 ADUs in 2018 and 25 ADUs in 2019.

The 2018 and 2019 trends do not reflect the current interest and production rates of ADUs in Escondido. During 2020, the City approved 60 ADUs out of 74 applications. From January 1 to May 7, 2021, the City had 33 ADU applications, approved 36 ADUs, and issued building permits for 28 ADUs. Based on a linear, pro-rated trend, the City is expected to issue 80 ADU permits in 2021.



Based on the significant upward trend in ADU production since 2018 and the number of permits already issued in 2021, the City anticipates continued growth in ADUs in the Sixth planning cycle. Based on the 2020 production and recent trends, a highly conservative production rate of 45 units per year was projected for the eight years in the Sixth Cycle, yielding a total of 360 ADUs that can be counted toward the RHNA. As the City is considering adopting other incentives to encourage and promote ADUs, including allowing ADUs on religious properties and creating pre-approved plans, it can be reasonably expected that the City would permit more than 45 ADUs per year during the Sixth Cycle. The City is also including a strong ADU production monitoring program as a Housing Element implementation action. The City will continue to evaluate ADU production throughout the planning period and implement additional programs or adjust the RHNA assumptions as necessary.

The City surveyed the applicants for the intended use and estimated rent levels for the ADU applications. Based on this survey results, the City was able to determine the income/affordability levels of the ADUs.

Table 55: ADU Affordability Level (2018-2020)

Year	Total ADUs	Very Low	Low	Moderate	Above Moderate	% Very Low	% Low	% Moderate	% Above Moderate
2018	23	4	5	14	0	17%	22%	61%	0%
2019	40	9	3	18	10	23%	8%	45%	25%
2020	74 ¹	14	13	13	44	19%	17%	17%	47%

1. Affordability percentages calculated for ADU applications. 60 ADUs were approved in 2020.

Table 56: Average ADU Affordability Level (2018-2020)

Income Category	Average Production
Very Low	19.7%
Low	15.4%
Moderate	41.0%
Above Moderate	23.9%



Title	Units
Units per year	45
Total Units (8 Year Cycle)	360
Very Low Income Units	71
Low Income Units	56
Moderate Income	147
Above Moderate Income	86

G. No Net Loss

It is recommended that the EVSP also include capacity to accommodate additional units above the RHNA requirement, pursuant to Senate Bill 166, also known as “No Net Loss.” No net loss states that cities may not reduce potential housing capacity below the remaining RHNA requirements (RHNA – units built) through the planning period. To ensure that the City maintains adequate sites through the Sixth Cycle, it is generally recommended that cities include additional units above the RHNA. Table 58 illustrates the RHNA requirement with a 10% buffer above the RHNA.

	Above Moderate	Moderate	Low	Very Low	Totals
RHNA Allocation	4,967	1,527		3,113	9,607
10% No Net Loss Buffer	497	153		311	961
Total Required Units (RHNA + No Net Loss Buffer)	5,464	1,680		3,424	10,568

Density Transfer Programs

The City maintains density transfer programs within the Downtown and East Valley Specific Plans. The programs allow the transfer of residential density from properties that are not built to their maximum density or are unlikely to develop to properties with development proposals. The City maintains an active inventory of unused density "credits" that can be transferred to other properties for no charge or cost if requested by a developer. The City's density transfer program could be used in tandem with state density bonus laws to further increase the residential capacity of a project.

The program ensures that capacity in the Downtown and East Valley will never be lost if a property is developed with fewer residential units allowed by the zoning.

Low Assumed Yields

As documented, most recent developments in the City achieve the maximum density allowed by the zoning. Despite the promising project trends, the City intentionally estimated the potential of units



at 50% and 75% of the maximum allowed. This deduction further protects the City against net loss requirements.

H. Ability to Meet RHNA

Overall, the City has the ability to accommodate at least 8,663 units on vacant and underutilized sites across the City. Of that total, 7,295 units are located in zones that allow at least 30 du/ac, indicating that they may accommodate lower-income units. Additionally, 6,328 of these high-density units are located on sites or on adjacent sites with cumulative areas between 0.5 and 10 acres, indicating that they may be counted toward the lower income capacity. While these sites meet the criteria for lower-income households, the City is assuming that 1,970 above-moderate units and 4,358 lower-income units could be accommodated on these high-density, correctly sized sites.

The EVSP area is anticipated to accommodate 644 above moderate units, 251 moderate income units, and 1,448 lower-income units. Even without the EVSP, the City would have adequate site for the lower-income units RHNA through the other two specific plans. However, the City would have a small shortfall for above-moderate and moderate income units until the EVSP is adopted. The above-moderate shortfall is 569 units, and the moderate income shortfall is 186 units. With the adoption of the EVSP (anticipated by the end of 2021), the City would have adequate sites across all income levels. Table 59 summarizes the City's RHNA status.

Table 59: Summary of RHNA Status

Site Category	Above Moderate	Moderate	Low	Very Low	Total
RHNA	4,967	1,527	1,249	1,864	9,607
Units on Identified Sites	2,950	1,355	0	4,358	8,663
Downtown Specific Plan	1,096	590	0	2,404	4,090
South Centre Specific Plan	230	213	0	506	949
East Valley Specific Plan	644	251	0	1,448	2,343
Non-Specific Plan	980	301	0	0	1,281
Approved and Under Construction Projects	1,357	90	155	0	1,602
Projects Undergoing Entitlement	649	0	371	0	1,020
Accessory Dwelling Units	86	147	56	71	360
Total Identified Capacity	5,042	1,592	582	4,429	11,645
Surplus/(Shortfall) without EVSP	(569)	(186)	450		---

I.

I. Financial Resources

Affordable housing for lower and moderate income households requires the creative layering of multiple funding sources. Key funding sources available for the construction, acquisition / rehabilitation, and preservation of affordable housing include:

Community Development Block Grants

The Community Development Block Grant ("CDBG") program was initiated by the Housing and Community Development Act ("HCDA") of 1974. The primary objective of the program is to develop viable urban communities by providing decent housing, a suitable living environment, and economic opportunities, principally for persons of low incomes (up to 80% AMI). CDBG funds can be used for a wide array of activities, including:

- Housing rehabilitation;
- Lead-based paint screening and abatement;
- Acquisition of buildings and land;
- Construction or rehabilitation of public facilities and infrastructure; and
- Public services for low income persons and persons with special needs.

The City of Escondido is an entitlement jurisdiction for CDBG funding and receives approximately \$1.8 million annually. The City uses CDBG funds to provide residential rehabilitation assistance and a variety of supportive services for lower income residents and those with special needs.

HOME Investment Partnership Program

The HOME Investment Partnership Program ("HOME") provides federal funds for the development and rehabilitation of affordable rental and ownership housing for households with incomes not exceeding 80% of area median income. The program gives local governments the flexibility to fund a wide range of affordable housing activities through housing partnerships with private industry and non-profit organizations. HOME funds can be used for activities that promote affordable rental housing and homeownership by low income households.

Escondido is an entitlement jurisdiction that receives HOME funds directly from HUD. Each year, the City receives approximately \$600,000 in HOME funds. The City uses HOME funds to support affordable housing development through Community Housing Development Corporations (CHDOs) and pursue acquisition/rehabilitation of multi-family rental housing.

Emergency Solutions Grant

The Emergency Solutions Grant program ("ESG") provides funds for a variety of activities to address homelessness. The ESG program provides grant funding to:

- Engage homeless individuals and families living on the street;
- Rapidly re-house homeless individuals and families;

- Help operate and provide essential services in emergency shelters for homeless individuals and families; and
- Prevent individuals and families from becoming homeless.

Escondido is an entitlement jurisdiction that receives ESG funds directly from HUD. Each year, the City receives approximately \$160,000 in ESG funds.

SB2/LEAP Grants

In 2017, Governor Brown signed a 15-bill housing package aimed at addressing the State's housing shortage and high housing costs. Specifically, it included the Building Homes and Jobs Act (SB 2, 2017), which establishes a \$75 recording fee on real estate documents to increase the supply of affordable homes in California. Because the number of real estate transactions recorded in each county will vary from year to year, the revenues collected will fluctuate.

The first year of SB 2 funds are available as planning grants to local jurisdictions. The City of Escondido received \$310,000 for planning efforts to facilitate housing production. For the second year and onward, 70% of the funding will be allocated to local governments for affordable housing purposes. A large portion of year two allocations will be distributed using the same formula used to allocate federal Community Development Block Grants ("CDBG"). As an entitlement jurisdiction in the CDBG program, Escondido is eligible to receive funding under the Permanent Local Housing Allocation ("PLHA") component of SB 2, estimated at \$5,057,466 over five years. SB2 PLHA funds can be used to:

- Increase the supply of housing for households at or below 60% of AMI
- Increase assistance to affordable owner-occupied workforce housing
- Assist persons experiencing or at risk of homelessness
- Facilitate housing affordability, particularly for lower and moderate income households
- Promote projects and programs to meet the local government's unmet share of regional housing needs allocation

Another source of funding to help local jurisdictions to update their planning documents and implement process improvements that will facilitate housing construction is the Local Early Action Planning (LEAP) grants. The City received \$500,000 in LEAP grants in 2020. However, this is a one-time-only program.

California Community Housing Agency

On January 13, 2021, the City Council became a member of the California Community Housing Agency ("CalCHA"). Through its Essential Middle-Income Rental Housing Program ("Program"), CalCHA issues government bonds for the acquisition of existing market-rate apartment communities through the issuance and sale of its own governmental purpose bonds.

J. Administrative Capacity

Escondido collaborates with a number of nonprofit organizations to expand affordable housing opportunities for residents including:

- Community HousingWorks: 16-unit 15th Avenue Coop; 36-unit Avocado Court; 13-unit Daybreak Cove; 24-unit Eucalyptus View; 200-unit Manzanita Apartments; 32-unit Orange Place Cooperative; and 8-unit Sunrise Place
- National Core: 44-unit Cobblestone Street Apartments; and 61-unit Juniper Senior Village
- Urban Housing Communities: 55-unit Crossings @ Escondido; and 44-unit Crossings @ Escondido Manor.

The City will continue to work with these and other qualified non-profit affordable housing developers to create affordable housing through new construction, acquisition/rehabilitation, and preservation.

K. Opportunities for Energy Conservation

Sustainability is a key community goal reflected throughout the General Plan. Escondido is largely built-out with limited vacant land available for new development. Updated General Plan policies will guide citizens, developers, city staff, and decision-makers over the next decades to facilitate the community's long-term vision. The plan's smart growth principles represent a shift in focus from "how to develop vacant land" to "how to reinvest in existing neighborhoods."

Escondido's smart growth principles preserve and enhance single-family development patterns in established neighborhoods, maintain residential densities in outlying areas to accommodate growth, and guide additional employment and residential growth toward downtown and urbanized sectors along key transportation corridors.

A land use strategy of the General Plan is to promote mixed-use developments, with the goal of integrating employment, retail, entertainment, and community amenities within close proximity to create vibrant urban areas. Successfully integrating residential, employment, entertainment, shopping, and services in a mixed-use overlay is effective in reducing reliance on the automobile as residents are able to conveniently access facilities and services.

General Plan Conservation Goals and Policies

In addition to policies contained in this Housing Element, Land Use and Community Form Element and Resource Conservation Element contains the following policies that promote energy conservation:

Community Character Policy 1.8

Require development projects to locate and design buildings, construct energy and water efficient infrastructure, reduce greenhouse gas emissions, enhance community livability and economic vitality, and implement other practices contributing to sustainable resources.

Community Character Policy 1.9

Require that development in downtown, at transit stations, and other key districts accommodate a mix of land uses and configure uses to promote walkability, bicycling, and transit uses, reducing the need for the automobile.

Air Quality and Climate Protection Policy 7.2

Reduce regional greenhouse gas emissions through the following measures including, but not limited to:

- a) Implementing land use patterns that reduce automobile dependence (compact, mixed-use, pedestrian, and transit-oriented development, etc.);
- b) Reducing the number of vehicular miles traveled through implementation of Transportation Demand Management programs, jobs-housing balance, and similar techniques;
- c) Supporting public transportation improvements;
- d) Encouraging the use of alternative modes of transportation by expanding public transit, bicycle, and pedestrian networks and facilities;
- e) Participating in the development of park-and-ride facilities;
- f) Maintaining and updating the City's traffic signal synchronization plan;
- g) Promoting local agriculture;
- h) Promoting the use of drought-tolerant landscaping; and
- i) Encouraging the use of non-polluting alternative energy systems.

Building Code Enforcement

Building Energy Standards for Residential Development (Title 24), establishes energy budgets or maximum energy use levels. Title 24 standards supersede local regulations, and State law mandates Title 24 requirements through implementation by local jurisdictions. The City will continue strict enforcement of local and state energy regulations for new residential construction and continue providing residents with information on energy efficiency.

6. Housing Plan

The Housing Plan identifies the City's housing goals, policies, and implementing programs. The overall strategy is to present a diverse and balanced array of policies that cover four overall areas of concern: construction, rehabilitation, conservation, and administration. The goals and policies of the Housing Element are organized into concise goal and policy directives.

A. State Housing Goals

California legislature sets the context and findings for housing goals as part of the State's housing laws (Government Code §65580):

- The availability of housing is of vital statewide importance, and the early attainment of decent housing and a suitable living environment for every Californian, including farmworkers, is a priority of the highest order.
- The early attainment of this goal requires the cooperative participation of government and the private sector in an effort to expand housing opportunities and accommodate the housing needs of Californians of all economic levels.
- The provision of housing affordable to low and moderate income households requires the cooperation of all levels of government.
- Local and State governments have a responsibility to use the powers vested in them to facilitate the improvement and development of housing to make adequate provision for the housing needs of all economic segments of the community.

The Legislature recognizes that in carrying out this responsibility, each local government also has the responsibility to consider economic, environmental, and fiscal factors and community goals set forth in the general plan and to cooperate with other local governments and the State in addressing regional housing needs.

B. City Housing Goals, Policies, and Programs

A complete list of the General Plan Goals is located in the Vision and Purpose. Specific goals and policies related to housing provided below are intended to guide development to meet present and future needs, achieve a vibrant community, and enhance the character of Escondido.

GOAL 1: Plan for quality, managed, and sustainable growth

Housing Policy 1.1: Expand the stock of all housing while preserving the health, safety, and welfare of residents, and maintaining the fiscal stability of the City.

Housing Policy 1.2: Housing projects shall fund all or a portion of public facilities and costs for providing municipal services directly related to the need created by the development. The amount must be proportional to the cost of the service or improvement to offset the impacts to public facilities, services, and operations.

Housing Policy 1.3: Pursue a balance of jobs to housing.

Housing Policy 1.4: Channel residential growth to areas where the concurrent provision of services and facilities, including schools, parks, fire and police protection, and street improvements can be assured.

Housing Policy 1.5: Encourage a compact, efficient urban form that conserves land and other natural and environmental resources, and that promotes transit, supports nearby commercial establishments, and takes advantage of infrastructure improvements installed to accommodate their intended intensities.

Housing Policy 1.6: Encourage creative residential developments and partnerships that result in desirable amenities and contribute to infrastructure needs.

Housing Policy 1.7: Incorporate smart growth principles in new residential subdivisions, multi-family projects, and Mixed-Use Overlay areas.

Housing Policy 1.8: Create climate safe and decent housing options by supporting more comfortable and resilient homes and buildings to proactively adapt to changing weather-related emergencies and climate hazard events.

Housing Policy 1.9: Improve affordability by promoting sustainable housing practices that incorporate 'whole system' approach to siting, designing, and constructing housing that is integrated into the building site, consumes less water and improves water quality, reduces the use of energy and other resources, and minimizes its impact on the surrounding environment.

Housing Policy 1.10: Prioritize the provision of water and sewer services for proposed housing developments that help address the lower income housing needs.

Program 1.1: Sites Inventory and No Net Loss/Replacement Housing Monitoring

Action: For the 2021-2029 Housing Element planning period, the City of Escondido has been allocated a Regional Housing Needs Assessment ("RHNA") of 9,607 units (1,864 very low income; 1,249 low income; 1,527 moderate income, and 4,967 above moderate income units). The City could meet a portion of its RHNA with units entitled and in the pipeline, as well as anticipated Accessory Dwelling Units ("ADUs").

The City will continue to support construction of new housing for homeownership and rental units on vacant and nonvacant sites identified in the sites inventory. The majority of the future residential development will occur within three specific plan areas: Downtown Specific Plan; South Centre City Specific Plan; and the new East Valley Specific Plan. Scattered sites in lower density neighborhoods also provide opportunities for some additional housing. The East Valley Specific Plan (EVSP) is anticipated to be adopted by the end of 2021. Until the adoption of the EVSP, the City would have a shortfall in adequate sites for 569 above moderate income units and 186 moderate income units. With the adoption of the EVSP (anticipated by winter 2021/2022), the City will ensure at least 36

acres will be rezoned to Urban Residential IV/V (21 du/ac minimum), or 25 acres of Mixed Use (30 du/ac minimum) or any combination of the two designations to fully accommodate the shortfall of 569 above moderate income units and 186 moderate income units. Specifically, these zones will permit multi-family by right (without discretionary action) and meet the requirements of Government Code 65583.2, including, but not limited to a minimum density of 20 units per acre, minimum site size to permit at least 16 units on site, and allow ownership and rental housing by right in which at least 20% of the units are affordable to lower income households.

To ensure that the City monitor its compliance with SB 166 (No Net Loss) and AB 1397 (Replacement Requirement), the City will develop a procedure in 2021 to track:

- Unit count and income/affordability assumed on parcels included in the sites inventory.
- Actual units constructed and income/affordability when parcels are developed.
- Demolition of existing residential units, especially those that have been deed restricted or occupied by lower income households.
- Net change in capacity and summary of remaining capacity in meeting remaining Regional Housing Needs Allocation ("RHNA").

Anticipated Impact: New housing opportunities for homeownership and rental for all households.

Responsible Agency: Community Development/Planning

Financing: Departmental budget

Schedule:

- Adopt East Valley Specific Plan by the end of 2021.
- Provide the sites inventory on City website and update the inventory at least semi-annually.
- Develop procedure for monitoring No Net Loss by the end of 2021.
- Amend the Zoning Code in 2022 to require replacement of existing units deed restricted or occupied by lower income households as a condition of project approval, consistent with the requirements of State Density Bonus law replacement requirements, pursuant to AB 1397.

Program 1.2: Density Transfer Programs

Action: The City maintains density transfer programs within the Downtown and East Valley Specific Plans. The programs allow the transfer of residential density from properties that are not built to their targeted density. The City maintains an active inventory of unused density "credits" that can be transferred to other properties for no charge if requested by a developer. The City's density transfer program could be used in tandem with state density bonus laws to further increase the residential capacity of a project. The programs ensure that capacity in the Downtown and East Valley will never be lost if a property is developed with fewer residential units allowed by the zoning.

Anticipated Impact: Efficient use of land resources

Responsible Agency: Community Development/Planning

Financing: Departmental budget

Schedule:

- Establish density transfer program for East Valley Specific Plan in 2021-2022, after adoption of the Specific Plan anticipated before August 15, 2021.
- Explore an in-lieu fee in 2022 for developing below the targeted densities (Target Production Point, or TPP).

Program 1.3: By-Right Approval of Projects with 20% Affordable Units on "Reuse" Sites and Sites Rezoned

Pursuant to AB 1397 passed in 2017, the City will amend the Zoning Code to require by-right approval of housing development that includes 20% of the units as housing affordable to lower income households, on sites being used to meet the Sixth cycle RHNA that represent the following:

- "Reuse sites" previously identified in the Fourth and Fifth Cycles Housing Element; and
- Sites that are to be rezoned after the April 15, 2021 statutory deadline of the Housing Element through the adoption of the East Valley Specific Plan.

Appendix B provides a listing of parcels for the City's RHNA.

Anticipated Impacts: Facilitate housing development for lower income households

Responsible Agency: Community Development/Planning

Financing: Departmental budget

Schedule: Within one year of the adoption of the Housing Element

Program 1.4: City-Owned Sites

Action: The City maintains an inventory of City-owned properties. These parcels are periodically assessed for their potential redevelopment or development for residential use. The objective is to use City-ownership as an incentive for affordable housing development. To the extent feasible, the City will pursue projects that include housing for extremely low income households and those with special needs such as seniors and persons with disabilities.

Anticipated Impacts: Sites for affordable housing

Responsible Agency: Community Development/Planning and Housing

Financing: Departmental budget

Schedule:

- Annually review the inventory of city-owned properties and determine if any should be made available for affordable housing development.
- Annually utilize an RFP process to solicit affordable housing proposals on properties identified for affordable housing development.
- Within one year of Housing Element adoption, identify all sites included in the Residential Lands Inventory that are City-owned and actively explore opportunities to facilitate development of such properties, subject to following the requirements of the Surplus Land Act.

Program 1.5: Lot Consolidation

Action: Action: Consolidation of small lots allows a development to utilize the land more efficiently, achieve economies of scale, and offer opportunity for improved site design and amenities. The City encourages the consolidation of small lots to facilitate the development of mixed-use and multi-family developments, particularly for affordable housing by:

- Maintaining an inventory of sites on the City's website.
- Assisting developers in identification of parcels with lot consolidation potential.
- Continuing to utilize a ministerial process for lot consolidation unless other discretionary reviews are required as part of the project.
- Considering incentives to facilitate lot consolidation, which may include reduced/waived fees, expedited process, graduated density based on consolidated lot size, flexibility in parking standards/requirements, or other feasible options.

Anticipated Impacts: Efficient use of land resources

Responsible Agency: Community Development/Planning and Housing

Financing: Departmental budget

Schedule:

- Develop incentives to facilitate lot consolidation in 2022.
- Monitor the trend of lot consolidation in 2024 to ensure incentives are adequate and appropriate to facilitate development of small lots, and adjust incentives or utilize other mechanisms as appropriate.

Program 1.6: Density Bonus

Action: City staff completed an amendment to the Zoning Code in 2020 to modify Density Bonus provisions to be in compliance with State law at the time. The State has since passed a bill that made further changes to the State Density Bonus law. AB 2345 (Increase Maximum Allowable Density) - Revised the requirements for receiving concessions and incentives, and the maximum density bonus provided.

Anticipated Impacts: Facilitate affordable housing development

Responsible Agency: Community Development/Planning

Financing: Departmental budget

Schedule:

- In 2022, the City will review and as necessary amend its Zoning Ordinance to ensure compliance with State law.

Program 1.7: Removal of Constraints to Development

Action: The City will facilitate development by removing potential constraints to development.

Ground-Floor Commercial Uses Only: Portions of the Downtown Specific Plan have nonresidential zones where residential densities are permitted or allowed. However, the zoning requires ground floor uses 1) in a storefront location are limited to retail-serving uses only; or 2) residential uses are permitted only above or behind a primary use. However, it may be difficult to market and develop a property with these blanket ground floor commercial requirements because there is a finite economic market available to support providing additional commercial services. Mixed use thrives when it is focused in a compact area, not over lengthy corridors, as is currently mandated in these specific plans. For mixed-use projects, the City will amend zoning regulations to require ground floor commercial uses only at key locations or preference areas based on context or planning objectives rather than as a blanket requirement to ensure future projects are feasible and the desired community character is preserved. Key locations will be determined by City Council.

Design Review Findings for Residential Projects: The City requires design review approval for most proposed developments. Unless exempt, residential projects are reviewed for design quality. However, the City does not have a set of design guidelines that involves no personal or subjective judgement by the City or its staff. In response to concerns that such a process could pose a constraint to housing, the City will evaluate its design review process for its potential to be subjectively applied to deny a residential development. As noted in the Constraints Analysis, there is no history that a residential project was denied solely on design review. Regardless, the City will develop a set of uniformly verifiable design criterion for new residential projects. New residential projects would need to meet or satisfy three findings, namely, that a project: 1) is consistent with the General Plan, a Specific Plan or the Zoning Code/Municipal Code; 2) is substantially consistent with the Design Review Guidelines; and 3) would not adversely affect the health, safety, or general

welfare of the community. As such, after program implementation the City would have uniformly verifiable design criterion available and knowledgeable by the development applicant and the public official prior to design review submittal.

Streamlined Review (SB 35): The City will establish a streamlined, ministerial review process for qualifying multi-family residential projects consistent with SB 35.

Water and Sewer Priority (SB 1087): Consistent with State law, the City will establish a written procedure to provide affordable housing with priority for water and sewer services.

Anticipated Impacts: Facilitate housing development

Responsible Agency: Community Development/Planning

Financing: Departmental budget, SB 2/LEAP Planning Grants

Schedule:

- In 2021-2022, the City will review and amend its Zoning Code to remove constraints to development: relating to the requirement of ground floor retail in specific mixed use districts; establish objective design criteria; establish a procedure to process qualifying projects under SB 35; and establish a written procedure to provide affordable housing with priority for water and sewer services.

Program 1.8: Monitoring of Growth Management Measure

Action: Periodically monitor and evaluate Proposition S for its impacts on the cost, supply and timing of housing, including seeking input from residential developers and affordable housing stakeholders in reviewing the effects of Proposition S. The review will analyze the ability to accommodate the City's RHNA, constraints on the supply and affordability of housing. Based on the outcomes of the evaluation and consideration of stakeholder input, the City will establish appropriate action to mitigate the impacts, including conducting a series of workshops/discussions to educate the community regarding State law requirements and the need for a balanced community.

Anticipated Impacts: Increased public awareness of the City's housing needs and obligations under State law

Responsible Agency: Community Development/Planning

Financing: Departmental budget

Schedule:

- Monitor the City's progress toward the RHNA and review Proposition S as a potential constraint annually.

GOAL 2: Provide a range of housing opportunities for all income groups and households with special needs

Housing Policy 2.1: Plan for adequate development potential to accommodate the regional share of housing for all income groups and promote equal access to resources and amenities.

Housing Policy 2.2: Encourage new development to provide a range of housing by type, size, location, price, and tenure to provide a greater array of housing types.

Housing Policy 2.3: Increase homeownership in the City through education, availability, and affordability.

Housing Policy 2.4: Apply criteria demonstrating appropriateness for converting mobile home parks to ownership or alternative uses.

Housing Policy 2.5: Work to eliminate all forms of housing discrimination.

Program 2.1: Accessory Dwelling Units

Action: Escondido's Zoning Code permits ADUs in all residential and mixed-use zones where a residential unit already exists. Accessory dwelling units must also comply with the development standards of the underlying zone, except where precluded by State law. Additionally, the zoning code has a provision that states that the section "shall be interpreted liberally in favor of accessory dwelling unit construction," which further removes constraints on ADU production in case of ambiguities in the standards.

Anticipated Impacts: Additional housing opportunities for lower and moderate income households

Responsible Agency: Community Development/Planning

Financing: Departmental budget, LEAP grant

Schedule:

- Continue to promote ADU as an affordable housing and income source for property owners and provide ADU resources on the City website, with the goal of facilitating 360 ADUs over eight years.
- In 2022, review the ADU ordinance for compliance with State law, including objective design standard requirements and amend the ordinance as necessary and appropriate.
- Amend the ADU ordinance in 2022 to allow ADUs on churches and places of worship, and other premises with social organizations as the principal land use. The ADU ordinance modification would consider the following:
 - Allowing an ADU up to 1,000 square feet to be built (and follow other similar standards) on the same property as a church, place of worship or other social organizations, regardless of the zoning for the property.
 - Potentially allowing more than one ADU to be built on site.

- Imposing deed restrictions on the ADUs.
- Continue to offer the City's incentives to facilitate ADU development:
 - Removed parking requirement; and
 - Removed owner-occupancy requirement beyond the State-established sunset year of 2025.
- Develop eight to nine pre-approved ADU floor and architectural plans by 2022.
- Monitor the trend of ADU construction annually, including affordability, in the City through the Housing Element Annual Progress Reports. If trends indicate a potential shortfall in meeting the estimated 360 ADUs or by affordability, strengthen the City efforts to incentivize ADU construction and reassess and revise the City's overall sites strategies for the RHNA within six months through adjusting ADU capacity assumptions consistent with actual permitted units, identifying additional sites to increase the City's No Net Loss Buffer to the extent necessary to fully accommodate the RHNA (see also Program 1.1 for monitoring of no net loss) and rezoning if necessary.

Program 2.2: First-Time Homebuyer Assistance

Action: The biggest hurdle faced by first-time homebuyers is usually coming up with enough money for the closing costs and down payment. The City's Homebuyer Entry Loan Program ("HELP") provides Eligible homebuyers a low-interest loan limited to five percent of the purchase price that can be used toward the down payment and/or for closing costs. Eligible homebuyers must provide an additional one percent of the purchase price toward closing costs and/or down payment. Affordability restrictions of 10 years will apply to the property. The property may not be rented out while the City loan is outstanding. Repayment of the City's loan is deferred until sale, transfer, refinance, additional liens to the property, or no longer live in the home as principal residence.

Anticipated Impacts: Additional housing opportunities for lower income households

Responsible Agency: Community Development/Housing

Financing: HOME

Schedule:

- Assist one household annually with HELP (for eight households over the Housing Element planning period).
- Beginning in 2022, explore funding availability annually and pursue additional funding to expand the program scope and eligible households.

Program 2.3: Essential Middle Income Rental Housing Program

Action: On January 13, 2021, the City Council became a member of the California Community Housing Agency ("CalCHA"). Through its Essential Middle-Income Rental Housing Program

("Program"), CalCHA issues government bonds for the acquisition of existing market-rate apartment communities through the issuance and sale of its own governmental purpose bonds. As a governmental entity, CalCHA is granted a 100% property tax exemption for each property it acquires. These complexes are then converted to rent-restricted units for Low-Income, Median-Income, and Moderate-Income households earning no more than 120% of AMI. Under the Program, no existing tenants are displaced. Rents on affordable units created through this Program would be capped at a maximum of 35% of the applicable percentage of AMI, and annually rent increase percentages are also capped at a maximum of four percent, which is well below the limits allowed with AB1482. All new tenants would need to income-qualify.

Anticipated Impacts: Additional housing opportunities for lower and moderate income households

Responsible Agency: Community Development/Housing

Financing: Government bonds

Schedule:

- Identify rental properties for potential acquisition and conversion to affordable housing under the CalCHA program.

Program 2.4: Housing Choice Vouchers (HCV)

Action: This program ensures that households earning less than 50% of the Area Median Income would spend less than 30% of income for rent. This program is administered by the San Diego County Housing Authority on behalf of the City via a participation agreement.

Anticipated Impacts: Rental Assistance for extremely low /very low income households – 1,000 households with Housing Choice Vouchers (based on current level of assistance according to HACSD); 30 senior/disabled households for rent subsidies

Responsible Agencies: Housing Authority of the County of San Diego ("HACSD")

Financing: HUD Section 8 Vouchers

Schedule:

- Continue to provide information on and refer eligible households to the Housing Choice Voucher.
- Annually assist about 30 very low income households with rent subsidies at apartment complexes and mobile home parks.
- Continue to market programs on City website and at public counters.

Program 2.5: Mobile Home Park Conversion

Action: The City has adopted a procedure by ordinance to assist occupants involved in the conversion of mobile home parks to resident ownership or alternative uses.

Anticipated Impacts: Housing stabilization and home ownership opportunities for lower and moderate income households

Responsible Agency: Community Development/Planning and Housing

Financing: Departmental budget

Schedule:

- Annually promote the option of mobile home park conversion to mobile home park tenants.
- As needed, provide technical assistance to mobile home park tenants and assist in the application for funding from HCD to pursue mobile home park conversion to resident ownership.

Program 2.6: Mobile Home Rent Review

Action: The City passed, by initiative, an ordinance to review proposed increases in rents in mobile home parks. The Rent Review Board considers such requests with the objective of maintaining affordability of the units.

Anticipated Impacts: Stabilized rents for mobile home residents, many of whom are lower income

Responsible Agencies: Community Development/Housing; Rent Review Board

Financing: Departmental budget

Schedule: Ongoing

Program 2.7: Special Needs Housing

Action: The City will review and revise the Zoning Code to address the provision of special needs housing.

Transitional and Supportive Housing: SB 745 (2014) specifies that transitional housing and supportive housing should be considered a residential use of property, and subject only to those restrictions that apply to other residential dwellings of the same type in the same zone. Furthermore, pursuant to AB 2162, supportive housing meeting certain criteria must be permitted by right where residential uses are permitted, including mixed-use and nonresidential zones. The City may not impose minimum parking requirements on projects located within a half mile from transit. Escondido's Zoning Code does not permit mixed-use development outside of specific plan areas; these plans do not explicitly identify transitional and supportive housing as separate from residential uses. The City will review SB 745 and AB 2162 and revise the Zoning Code as necessary to ensure compliance.

Emergency Shelters: The City established an Emergency Shelter Overlay where emergency shelter is a permitted use by right in M-1 and M-2 zones, consistent with SB 2 (2007). In 2020 the City also amended the ES Overlay to establish parking standards based on staffing level plus two parking

spaces. AB 139 allows the parking standards to be set solely based on staffing level. Furthermore, the Overlay establishes a separation requirement of at least 300 feet. This requirement is not consistent with SB 2, which allows a separation requirement from another shelter at a maximum separation of 300 feet. The City will amend the Zoning Code to revise the separation requirement and parking standard consistent with State law.

Employee Housing: Pursuant to the State Employee Housing Act (Section 17000 of the Health and Safety Code), employee housing for agricultural workers consisting of no more than 36 beds in a group quarters or 12 units or spaces designed for use by a single-family or household is permitted by right in an agricultural land use designation. For properties that permit agricultural uses by right, a local jurisdiction may not treat employee housing that meets the above criteria any differently than an agricultural use. Furthermore, any employee housing providing accommodations for six or fewer employees shall be deemed a single-family structure within a residential land use designation, according to the Employee Housing Act. Employee housing for six or fewer persons is permitted wherever a single-family residence is permitted. Currently the Zoning Code does not address these requirements explicitly.

Reasonable Accommodation for Persons with Disabilities: The City grants requests for reasonable accommodation if specific findings can be made. The finding related to compatibility with surrounding uses may be considered subjective and therefore a constraint to housing for persons with disabilities. The City will amend the Zoning Code to review and revise the findings for reasonable accommodation.

Residential Care Facilities for Seven or More Persons: These uses are conditionally permitted in residential zones. This process may be considered a constraint to housing for persons with disabilities.

Manufactured Homes: The City's Zoning Code permits manufactured homes in single-family residential zones only, not in all zones that permit single-family homes. Furthermore, modern construction methods have also expanded to produce manufactured multi-family housing. The City will amend the Zoning Code to permit manufacture housing meeting the California Building Code standards in zones where residential uses are permitted.

Anticipated Impacts: Increased housing opportunities for households with special needs

Responsible Agency: Community Development/Planning

Financing: Departmental budget

Schedule:

- Review and revise the Zoning Code as necessary in 2022 to remove constraints to special needs housing, specifically to:
 - Comply with SB 745 and AB 2162 for transitional and supportive housing.
 - Comply with SB 2 separation requirement.

- Comply with Employee Housing Act.
- Ensure findings for reasonable accommodation requests are objective.
- Permit residential care facilities for seven or more persons as similar uses in the same zone.
- Permit manufactured housing meeting building code standards in zones where residential uses are permitted.

Program 2.8: Affordable Housing Development

Action: The City will continue to pursue a variety of funding sources to support the construction, acquisition/rehabilitation, and preservation of affordable housing in the community, especially funding opportunities that benefit extremely low income households and those with special needs (including elderly, disabled/developmentally disabled, homeless/at-risk homeless, and farmworkers). Funding sources may include federal, state, local, and other private housing programs, including but not limited to:

- Low Income Housing Tax Credits ("LIHTC")
- CalCHA bonds
- California Housing Finance Agency
- CalHome
- SB2 Permanent Local Housing Allocation
- HOME Investment Partnership Program
- Recycled RDA Funds

The City will facilitate affordable housing development for lower income (including extremely low income) and special needs housing by:

- Promoting the use of density bonus (Program 1.6);
- Providing technical assistance, pre-application consultation, and expedited review;
- Providing financial assistance, as funding permits; and/or
- Leveraging with City-owned sites (Program 1.4).

Anticipated Impacts: Acquisition, rehabilitation, preservation, or construction of affordable housing for lower and moderate income households.

Responsible Agency: Community Development/Housing

Financing: Departmental budget

Schedule:

- At least once a year explore funding availability under various programs and pursue funding if appropriate, with the goal of facilitating the development of 570 lower income units over eight years.
- Annually conduct outreach to developers for affordable housing opportunities.

GOAL 3: Enhance the quality of the city's housing stock and preserve the integrity of neighborhood character

Housing Policy 3.1: Maintain and enhance the existing housing stock as a source of low- and moderate-cost housing and as a conservation measure.

Housing Policy 3.2: Work to eliminate substandard housing through continued enforcement of the Health and Safety Code and the provision of programs which facilitate the maintenance and rehabilitation of housing.

Housing Policy 3.3: Utilize code enforcement measures and incentive programs as necessary to ensure that building and safety regulations are met and to promote property maintenance.

Program 3.1: Housing Rehabilitation

Action: Maintaining and improving the City's housing stock is an important goal of the City's overall affordable housing strategy. With limited local funding, the City pursued CalHOME funds to implement an owner-occupied rehabilitation program for single-family and mobile homes. This program has expired. The City continues to explore funding availability under various programs and to pursue funding, if appropriate.

The City also uses HOME and recycled RDA funds to work with developers to rehabilitate multi-family rental housing affordable to low-income households. The City will prioritize funding for rental housing that benefits extremely low income households and those with special needs, such as the elderly and disabled (including the developmentally disabled).

Anticipated Impact: Improved housing conditions for lower income households

Responsible Agency: Community Development/Housing

Financing: HOME and Recycled RDA funds

Schedule:

- Rehabilitate four rental units annually (32 units over eight years).
- Pursue additional funding to reinstate the owner-occupied rehabilitation program and expand the rental rehabilitation program, including an acquisition/rehabilitation component.

Program 3.2: Focus on Neighborhoods

Action: Through various local and State funds, the City makes funds and other resources available for the improvement of neighborhoods. Through proactive code enforcement, housing rehabilitation, and capital improvements, the City targets at improving the quality of life one neighborhood at a time. In addition, land use policies or ordinances are reviewed to explore means of providing community revitalization.

Anticipated Impacts: A place-based strategy for neighborhood improvements and the opportunity for significant community impact both in physical improvement and improvement in quality of life for neighborhood residents

Responsible Agency: Community Development/Housing

Financing: CDBG; General Fund

Schedule:

- Allocate funding for neighborhood services and improvements through the CDBG Annual Action Plan process.

Program 3.3: Preservation of at-Risk Housing

Action: Within the 2021-2031 "at-risk" housing analysis period, only Silvercrest is at low risk of converting to market-rate housing. The 75-unit project is at risk due to an expiring Section 8 contract. However, Silvercrest is a nonprofit-owned senior housing development; such projects receive priority from HUD for funding renewal.

Anticipated Impacts: Continued affordability of subsidized housing developments

Responsible Agency: Community Development/Housing

Financing: HOME, CalCHA, and other State and federal funds

Schedule:

- Annually, track the status of Silvercrest and other affordable housing developments with the intention of working with owners to extend affordability periods.
- Work to extend affordability covenants on Silvercrest and other affordable housing projects.
- Contact qualified entities and other affordable housing developers to solicit their participation in extending affordability covenants on existing affordable housing projects.
- If a Notice of Intent is filed by any affordable housing project to convert to market-rate, ensure the project complies with the expanded noticing (three-year, one-year, and six-month) as required by State law.
- Support the applications by nonprofits in their pursuit for funding to preserve affordable housing projects.



- If necessary, refer existing tenants to waiting lists of affordable developments as soon as possible to allow time for the waiting period and for relocation.

Program 3.4: Fair Housing

Action: The City will undertake a series of actions to affirmatively further fair housing as outlined below under schedule.

Anticipated Impacts: Continued enforcement of the Fair Housing Action Plan which will reduce or prevent discrimination in housing, disputes between landlords and tenants, and mitigate disparities in access to housing resources and opportunities in the community

Responsible Agencies: Community Development/Housing

Financing: CDBG

Schedule:

Fair Housing Issue	Contributing Factor	Meaningful Actions
Discrimination in the Private Market Limited Outreach Capacity	<ul style="list-style-type: none"> • Private discrimination • Lack of education and enforcement of fair housing laws • Limited media marketing – only City website • Meetings in same sites/same times 	<ul style="list-style-type: none"> • Annually through the funding allocation process, allocate resources to retain qualified fair housing service provider(s) to provide fair housing outreach, education, complaint investigation, testing, and legal services, as well as tenant/landlord counseling and mediation services. Assist approximately 200 persons annually. • Encourage the fair housing service provider to issue press releases to local medias on outcomes of fair housing complaints and litigation. • Conduct random testing on a regular basis to identify issues, trends, and problem properties. Adjust the random testing program to reflect new 2020 Census data and emerging trends in the City. • In 2022, develop an expanded fair housing outreach via a multi-media and multi-lingual approach, with increased efforts in the Downtown area. • In 2022, revise the scope of services by the fair housing service provider (LASSD) to conduct at least one fair housing workshop in Escondido, with targeted outreach to residents in the Downtown area.



Fair Housing Issue	Contributing Factor	Meaningful Actions
Segregation Patterns Housing Mobility	<ul style="list-style-type: none"> • Historical patterns of minority concentration • Location of affordable housing • Land use and zoning laws (high density and mobile park designations in these areas) • Lack of recruitment of landlords in high opportunity areas for HCV use 	<ul style="list-style-type: none"> • Beginning in 2022, increase outreach and education on the use of HCV, including the new State source of income protection (SB 329 and SB 222). Target additional outreach efforts in Downtown.
Disparate Access to Opportunities Location of RHNA Units in Low Resource Areas	<ul style="list-style-type: none"> • Racially concentrated areas of affluence in outskirts of City • Location of affordable housing • Lower quality schools in central census tracts • Lower environmental quality in central census tracts 	<p>Expand housing opportunities to other parts of the City:</p> <ul style="list-style-type: none"> • Pursue adoption of the EVSP by winter 2021/2022 and implementation to expand locational and housing type choices. • Develop an Affirmative Marketing Plan (AFM) in 2022 and ensure all developments with affordable units adhere to the AFM requirements to advertise the availability of affordable units. AFM should emphasize outreach to the Downtown and EVSP. • Amend the ADU ordinance in 2022 to allow ADUs on churches and places of worship, and other premises with social organizations as the principal land use (see Program 2.1). Once the Zoning Code is amended, conduct annual outreach and education workshops to religious facilities and social organizations to solicit interest and provide technical assistance. <p>March 10, 2021 by Resolution No. 2021-37, the City created a mapping tool, called a Social Equity and Healthy Index Map to use data from the State OEHHA CalEnviroScreen to designate priority investment neighborhoods ("PINs") to measure the degree to which climate change would impact different geographical areas and to evaluate levels of access to opportunity within a census tract. The following programs will be acted on by the City to address AFFH.</p> <ol style="list-style-type: none"> 1. By 2021 develop a specific strategy or plan to redress social equity disparities by prioritizing and targeting CAP



Fair Housing Issue	Contributing Factor	Meaningful Actions
		<p>implementation projects into the most vulnerable areas as defined by the "2020 Social Equity and Health Index Map."</p> <ol style="list-style-type: none"> 2. By 2021, focus planning and intervention programs in PINs that currently experience social or environmental injustice and/or bear a disproportionate burden of potential public health impacts. 3. By 2024, when evaluating programs, projects, and infrastructure in at risk areas and PINs, prioritize efforts that decrease the urban heat island effect, especially in areas with populations most vulnerable to heat, through strategies like revegetation, tree preservation, new plantings, depaving and porous pavement, green infrastructure, and site specific development design. <p>Additionally, by 2023 the City will consider establishing equity considerations for recreation/parks programming, planning, engineering, and public works projects, such as:</p> <ul style="list-style-type: none"> • Does the proposed action generate burdens either directly or indirectly to vulnerable populations? If yes, are there opportunities to avoid, minimize, or reduce those impacts? • Can the benefits of the proposed action be targeted in ways to reduce vulnerable population disparities? • Are the benefits of the proposed action broadly accessible to residents or businesses of vulnerable populations?
<p>Disproportionate Housing Needs Anti-Displacement</p>	<ul style="list-style-type: none"> • Median rent increase • The availability of affordable units in a range of sizes • Lack of renter protections • Median income of residents • Displacement of residents due to economic pressures 	<p>Expand affordable and improve housing opportunities in Downtown and other areas with concentrated low income households by:</p> <ul style="list-style-type: none"> • Amend the Zoning Code in 2022 to require replacement of existing units deed restricted or occupied by lower income households as a condition of project approval (see Program 1.1).



Fair Housing Issue	Contributing Factor	Meaningful Actions
		<ul style="list-style-type: none"> • Amend Zoning Code in 2022 to require by-right approval of housing development that includes 20% of the units as housing affordable to lower income households, on reuse and rezone sites (see Program 1.3). • Pursue at least one affordable housing project under the CalCHA program in Downtown over the HE planning period (see Program 2.4). • Prioritize funding for rehabilitation and deed restriction of multi-family rental housing in Downtown, with the goal of achieving 16 units (see Program 3.1)

C. Summary of Quantified Objectives

The following summarizes the program objectives of the City's Housing Plan described above.

	Extremely Low	Very Low	Low	Moderate	Above Moderate	Total
RHNA	1,864		1,249	1,527	4,967	9,607
New Construction						
Approved/Pipeline Projects	0	0	616	0	2006	2,622
ADUs	71		56	147	86	360
Future Projects ¹	435		135	635	1,400	2,605
Rehabilitation	8	8	16	0	0	32
Conservation						
Preservation of At-Risk Housing ²	37	38	0	0	0	75
Housing Choice Vouchers	700	300	0	0	0	1,000
Notes:						
1. Future projects are estimated at 25% of the remaining very low and low income RHNA (after accounting for approved and pipeline projects as well as ADUs) and 50% of the remaining moderate and above moderate income RHNA.						
2. 75-unit Silvercrest						



Appendix A: RHNA Credits

This appendix provides detailed information on projects entitled, approved, or under review that could be credited against the City's RHNA. Affordable unit counts are based on plan entitlements, and agreements between the City and developer.

A. Entitled Units

Table A-1: RHNA Credits – Entitled Units		
Project	Description	Market Rate Units
Escondido Country Club - The Villages	380 single-family homes entitled, recreational amenities, and urban farm; 25 units permitted prior to July 1, 2020	355 units remaining to be permitted after July 1, 2020

B. Approved Projects

Table A-2: RHNA Credits - Approved Projects			
Project	Description	Market Rate Units	Affordable Units
SUB 13-0008 - 15th	4 SFR lots on 0.95 ac.	4	
SUB 13-0002 - Oak Creek "KB Homes"	65 SFR lots on 41.39 ac.	65	
SUB 13-0007 - Amanda Estates	21 SFR lots on 11.2 ac.	21	
TPM 2006-08 - E. Mission	3 SFR lots on 0.88 ac.	3	
Tract 848 - Idaho Ave	9 SFR lots on 3.55 ac.	9	
SUB 08-0030 - Reed Rd	4 SFR lots on 14.37 ac.	4	
TPM 2004-16 - Tulip	3 SFR on 1.03 ac.	3	
Tract 951 - Jacks Creek	12 SFR lots on 3.31 ac.	12	
SUB 13-0005 - El Norte	6 SFR lots on 1.15 ac.	6	
Tract 934 - 1207 N. Gamble St.	5 SFR lots on 1.19 ac.	5	
SUB 15-0002 - Wohlford, 661 Bear Valley Pkwy	55 SFR lots on 40.9 ac.	55	
Tract 933/TM SUB14-0010 - Moser	16 SFR lots on 6.4 ac. (revised submittal)	16	
Tract 878 - Lion Valley	11 SFR lots on 2.3 ac.	11	
Tract 890 - Midway Dr. SUB15-0010.	Tract 890 - Midway Dr. SUB15-0010.	10	
TM SUB 13-0001 Cranston	6 SFR lots on 7.41 ac.	6	
Tract 895 - Boyle. SUB15-0030	8 SFR lots on 5.42 ac.	8	
Del Prado- North & South (Woody's site); SUB 15-0023 & SUB15-0022	Mixed-use residential - 113 units	113	
LaCaze (Grand Ave)(PHG 17-0019)	Mixed-use	15	



Table A-2: RHNA Credits - Approved Projects

Project	Description	Market Rate Units	Affordable Units
TM 220 S. Citrus (SUB 17-0013)	8 SFR lots	8	
TPM 2003-07 - W. Lincoln	4 units on 0.45 ac.	4	
TPM 2006-06 Farr Ave	4 SFR lots on 0.93 ac.	4	
SUB 15-0005 – Birch	3 SFR lots on 0.95 ac.	3	
ADM 16-0138 – Apartments	10 units above parking	10	
SUB 17-0007 North Avenue Estates	34 homes	34	
PHG 17-0028 Quince Senior Housing	145-unit affordable senior housing	0	145
PPH Redevelopment. SUB18-0011.	510 units.	420	90 (moderate income senior units)
510 W. 2nd. ADM 18-0126 Mixed-Use	12,000 SF with residential (5 units)	5	
209 N. Tulip. SUB18-0017.	4-Lot TPM	4	
SUB 18-0007, 1361 Valle Lindo	TPM on 6.64 acres	13	
ADM 18-0003, 316 E. Pennsylvania	Mixed-use, 1 residential unit	1	
PHG 18-0021, 555 W. Grand	32 Condo units and mixed-use	32	
TR 920 2355 E. Lincoln Avenue	98 SFR on 74 acres "Henry Ranch"	98	
SUB 20-0002, Habitat for Humanity	10 condos at 245 E. El Norte	0	10

Source: Escondido Major Development Project Processing List, August, 2020.

C. Projects Under Review

Table A-3: Projects Under Review

Project	Description	Market Rate Units	Affordable Units
SUB 09-0005 – 1221 N. Gamble St.	3 SFR lots on 0.64 ac.	3	0
SUB 15-0019 – Safari Highlands	Specific Plan for 550 SFR lots on 1,100 ac.	550	0
Touchstone – Ivy	4 story, 95 new units. Purchased by affordable housing developer (MAAC).	0	95
SUB 15-0025, 701 San Pasqual Valley Road	18-lot TM and PD on 7 acres	18	0
ADM 19-0092, 1860 S. Escondido Vermont Apts.	44 apartments	40	4
ADM 20-0085, 322 S. Escondido	172 units	0	172
ADM 20-0011, 118 S. Orange	3 units	3	0
PHG 20-0036, 829 S. Escondido Blvd.	70 residential units (density bonus)	35	35
ADM 20-0070, 337 E. Valley Pkwy	50 unit affordable housing	0	50
ADM 20-0136 664 N. Fig Street	15 affordable apartment units	0	15

Source: Escondido Major Development Project Processing List, August, 2020.
 Anticipated affordability levels based on information submitted by project applicants.

Appendix B: Sites Inventory

DRAFT

Assessor Parcel Number	Parcel ID	Consolidated Site ID	Consolidated Area (Acres)	Specific Planning Area	General Plan	Zoning	Density	Site Area (Acres)	Existing Dwelling Units	Total New RHNA Units	New Lower Income Units	New Moderate Income Units	New Above Moderate Units	SANDAG Land Use	Assessor Land Use	Year Built	New Units / Existing Units Ratio	Land to Improvement Ratio	Fourth Cycle Site	Fifth Cycle Site
1871817500	517539	A	5.15		E2	RE-20	2.178	3.57	1	5			5	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	72	5	0.18	Yes	
1871817700	697501	A	5.15		E2	RE-20	2.178	1.58	1	2			2	Single Family Detached	SINGLE FAMILY RESIDENCE	90	2	1.05	Yes	
1873706500	697623		-		S	R-1-10	4.356	5.73	0	19			19	Vacant and Undeveloped Land	1 - 10 ACRES RURAL LAND OTHER	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
1900802700	5261706	R	40.98		R1	RA-5	0.2	33.39	0	5			5	Orchard or Vineyard	AVOCADO	Unknown	No Existing Units	4.37	Yes	Yes
2241007300	5335971	D	45.03		E2	RE-40	1.089	3.25	1	2			2	Spaced Rural Residential	SINGLE FAMILY RESIDENCE	61	2	1.59	Yes	Yes
2241008400	363056	D	45.03		E2	RE-20	2.178	3.72	0	6			6	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		Yes
2241008500	5335968	D	45.03		E2	RE-20	2.178	20.14	1	32			32	Spaced Rural Residential	SINGLE FAMILY RESIDENCE	48	32	4.83		
2241052400	5338663		-		E2	PD-R-1.6	1.6	18.49	0	22			22	Orchard or Vineyard	OPEN SPACE	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2241410200	137988	C	19.21		E2	RE-20	2.178	8.62	1	13			13	Spaced Rural Residential	SINGLE FAMILY RESIDENCE	60	13	2.58	Yes	Yes
2241410900	697957	C	19.21		E2	RE-20	2.178	3.72	0	6			6	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2241412300	691318	C	19.21		E2	RE-20	2.178	4.50	1	3			3	Spaced Rural Residential	2 - 4 UNITS - GENERIC	47	3	2.67		Yes
2241412500	5120531	C	19.21		E2	RE-20	2.178	1.94	1	1			1	Spaced Rural Residential	DUPLEX - GENERIC	43	1	2.86		Yes
2241423200	137982	E	2.99		S	R-1-10	4.356	1.65	1	2			2	Spaced Rural Residential	2 - 4 UNITS - GENERIC	45	2	2.00		
2241423300	137983	E	2.99		S	R-1-10	4.356	1.34	1	2			2	Spaced Rural Residential	2 - 4 UNITS - GENERIC	95	2	1.29	Yes	Yes
2241433000	697930	D	45.03		E2	RE-20	2.178	7.11	1	10			10	Spaced Rural Residential	AVOCADO	55	10	1.05	Yes	Yes
2241433200	5046469	D	45.03		E2	RE-20	2.178	2.41	0	4			4	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2241433300	5046468	D	45.03		E2	RE-20	2.178	5.48	1	8			8	Spaced Rural Residential	SINGLE FAMILY RESIDENCE - GENERIC	42	8	1.21	Yes	
2241435000	5335895	D	45.03		E2	RE-20	2.178	2.92	0	5			5	Orchard or Vineyard	AVOCADO	Unknown	No Existing Units	1.23	Yes	Yes
2241513500	715042	B	17.22		E2	RE-20	2.178	1.51	0	2			2	Field Crops	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes

Assessor Parcel Number	Parcel ID	Consolidated Site ID	Consolidated Area (Acres)	Specific Planning Area	General Plan	Zoning	Density	Site Area (Acres)	Existing Dwelling Units	Total New RHNA Units	New Lower Income Units	New Moderate Income Units	New Above Moderate Units	SANDAG Land Use	Assessor Land Use	Year Built	New Units / Existing Units Ratio	Land to Improvement Ratio	Fourth Cycle Site	Fifth Cycle Site
2241514100	715040	B	17.22		E2	RE-20	2.178	2.86	1	4			4	Spaced Rural Residential	SINGLE FAMILY RESIDENCE	37	4	1.41	Yes	Yes
2241514800	5229082	B	17.22		E2	RE-20	2.178	1.14	0	2			2	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2241515000	715037	B	17.22		E2	RE-20	2.178	1.32	0	2			2	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	
2241515100	5229084	B	17.22		E2	RE-20	2.178	10.39	0	17			17	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2241711900	630364		-		U1	R-1-7	6.22	0.58	1	2			2	Single Family Detached	SINGLE FAMILY RESIDENCE	58	2	1.19	Yes	
2242401600	697812		-		R2	RE-80	0.54	16.06	0	7			7	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	
2242806400	5265291		-		U1	R-1-7	6.22	0.83	1	3			3	Single Family Detached	SINGLE FAMILY RESIDENCE	78	3	1.66		
2249927700	697978	C	19.21		U1	PD-R-5.5	5.5	0.44	1	2			2	Single Family Detached	OPEN SPACE	Unknown	2	>1; \$0 Assessed Improvement Value		
2250103800	245934	J	21.02		E1	RE-40	1.089	9.14	1	6			6	Spaced Rural Residential	SINGLE FAMILY RESIDENCE - GENERIC	74	6	0.43	Yes	
2250200500	245920	J	21.02		E1	RE-40	1.089	5.72	1	4			4	Spaced Rural Residential	AVOCADO	55	4	2.16	Yes	
2250201400	5116360	J	21.02		E1	RE-40	1.089	6.16	1	4			4	Spaced Rural Residential	AVOCADO	Unknown	4	2.86	Yes	Yes
2250305600	5207000		-		S	R-1-10	4.356	1.27	1	3			3	Spaced Rural Residential	SINGLE FAMILY RESIDENCE	37	3	2.05	Yes	Yes
2250421100	701222	K	10.92		S	RE-20	2.178	0.96	0	2			2	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		Yes
2250422600	701247	K	10.92		S	RE-20	2.178	1.02	0	2			2	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		Yes
2250422700	701248	K	10.92		S	RE-20	2.178	1.04	0	2			2	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		Yes
2250422800	701321	K	10.92		S	RE-20	2.178	1.01	0	2			2	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		Yes

Assessor Parcel Number	Parcel ID	Consolidated Site ID	Consolidated Area (Acres)	Specific Planning Area	General Plan	Zoning	Density	Site Area (Acres)	Existing Dwelling Units	Total New RHNA Units	New Lower Income Units	New Moderate Income Units	New Above Moderate Units	SANDAG Land Use	Assessor Land Use	Year Built	New Units / Existing Units Ratio	Land to Improvement Ratio	Fourth Cycle Site	Fifth Cycle Site
2250423000	73617	K	10.92		S	RE-20	2.178	1.90	0	3			3	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		Yes
2250423100	245913	K	10.92		S	RE-20	2.178	4.99	1	7			7	Spaced Rural Residential	SINGLE FAMILY RESIDENCE - GENERIC	70	7	2.00		Yes
2250700600	177189		-		U1	R-1-7	6.22	0.77	1	3			3	Single Family Detached	SINGLE FAMILY RESIDENCE	52	3	1.69		
2250700900	177338		-		U1	R-1-10	4.356	0.96	1	2			2	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	54	2	1.43	Yes	
2250830500	702324		-		U1	R-1-10	4.356	0.89	0	3			3	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	
2251606100	701893		-		U1	R-1-7	6.22	1.43	1	6			6	Spaced Rural Residential	SINGLE FAMILY RESIDENCE	79	6	0.51	Yes	Yes
2251606300	5290544		-		U1	R-1-7	6.22	0.23	0	1			1	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	
2252700500	33009	Q	5.90		S	R-1-10	4.356	1.18	1	3			3	Spaced Rural Residential	SINGLE FAMILY RESIDENCE	80	3	2.17	Yes	Yes
2252702300	701901	Q	5.90		S	R-1-10	4.356	1.02	0	3			3	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2252704900	5246125	P	5.72		S	R-1-10	4.356	3.11	1	9			9	Spaced Rural Residential	SINGLE FAMILY RESIDENCE	72	9	1.59		
2252705800	5246120	P	5.72		S	R-1-10	4.356	2.61	1	8			8	Spaced Rural Residential	SINGLE FAMILY RESIDENCE	55	8	1.45		Yes
2252706300	5386426	Q	5.90		S	R-1-10	4.356	3.70	1	10			10	Spaced Rural Residential	2 - 4 UNITS - GENERIC	64	10	0.23		
2254804300	5257259		-		S	R-1-10	4.356	1.26	0	4			4	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	
2255937100	151367		-		U1	R-1-6	7.26	0.58	1	2			2	Single Family Detached	SINGLE FAMILY RESIDENCE	52	2	2.04		
2256106201	275007		-		U1	R-1-6	7.26	1.49	0	4			4	Single Family Multiple-Units	2 - 4 UNITS - GENERIC	45	No Existing Units	2.25	Yes	Yes
2256620100	388847		-		S	PD-R-3.3	3.3	6.59	1	15			15	Spaced Rural Residential	SINGLE FAMILY RESIDENCE	91	15	2.09		
2256708000	5116867		-		S	PD-R-3.3	3.3	1.70	1	3			3	Spaced Rural Residential	SINGLE FAMILY RESIDENCE	91	3	1.57		
2257201500	5116892		-		S	R-1-10	4.356	2.07	1	6			6	Single Family Detached	SINGLE FAMILY RESIDENCE	97	6	1.00		
2333521300	32732	ET	0.63	South Centre City	SPA 15	S-P	24	0.37	0	6		6	FALSE	Arterial Commercial	CAR WASH	1	No Existing Units	0.58	Yes	
2257302100	5116926		-		S	R-1-10	4.356	0.94	1	2			2	Single Family Detached	SINGLE FAMILY RESIDENCE	98	2	1.66		

Assessor Parcel Number	Parcel ID	Consolidated Site ID	Consolidated Area (Acres)	Specific Planning Area	General Plan	Zoning	Density	Site Area (Acres)	Existing Dwelling Units	Total New RHNA Units	New Lower Income Units	New Moderate Income Units	New Above Moderate Units	SANDAG Land Use	Assessor Land Use	Year Built	New Units / Existing Units Ratio	Land to Improvement Ratio	Fourth Cycle Site	Fifth Cycle Site
2262100700	100572		-		U2	R-2-12	12	0.87	0	8		8	FALSE	Other Retail Trade and Strip Commercial	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	36.04	Yes	
2263301500	5394478	G	30.27		SPA 13	R-1-10	4.356	4.36	0	14			14	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2263302400	701911	G	30.27		SPA 13	R-1-10	4.356	2.03	0	7			7	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2263302500	216688	G	30.27		SPA 13	R-1-10	4.356	1.05	1	2			2	Spaced Rural Residential	SINGLE FAMILY RESIDENCE	55	2	3.51	Yes	Yes
2263303800	180902	F	7.33		S	R-1-10	4.356	2.64	1	8			8	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	58	8	1.00	Yes	Yes
2263304000	701757	G	30.27		SPA 13	R-1-10	4.356	5.03	0	16			16	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	
2263305600	5265603	F	7.33		U1	PD-R-5.5	5.5	4.69	1	18			18	Single Family Detached	SINGLE FAMILY RESIDENCE	60	18	1.03		
2263401700	180883		-		E2	RE-20	2.178	2.22	1	3			3	Spaced Rural Residential	SINGLE FAMILY RESIDENCE	57	3	5.23	Yes	
2263601300	701616	H	2.26		S	R-1-10	4.356	0.96	0	3			3	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	
2263601400	701542	H	2.26		S	R-1-10	4.356	1.30	1	3			3	Spaced Rural Residential	SINGLE FAMILY RESIDENCE - GENERIC	60	3	1.04	Yes	
2263700600	701546	G	30.27		SPA 13	R-1-10	4.356	2.47	0	8			8	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	
2263700900	701859	G	30.27		SPA 13	R-1-10	4.356	2.63	1	8			8	Spaced Rural Residential	SINGLE FAMILY RESIDENCE	60	8	0.93	Yes	Yes
2263701100	701863	G	30.27		SPA 13	R-1-10	4.356	5.08	0	17			17	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2263701400	701697	G	30.27		SPA 13	R-1-10	4.356	0.81	0	3			3	Religious Facility	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2263702500	552735	G	30.27		SPA 13	R-1-10	4.356	2.83	1	8			8	Spaced Rural Residential	SINGLE FAMILY RESIDENCE	78	8	0.83	Yes	Yes
2263702800	701854	G	30.27		SPA 13	R-1-10	4.356	3.98	1	12			12	Spaced Rural Residential	SINGLE FAMILY RESIDENCE - GENERIC	42	12	4.00	Yes	Yes
2268204900	180901		-		S	R-1-10	4.356	1.00	1	2			2	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	32	2	4.89		

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2270312300	177212		-		U2	R-2-12	12	0.29	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	32	2	2.00	Yes	
2271013600	700900		-		E1	RE-40	1.089	3.44	0	3			3	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2271020300	138012		-		E2	RE-20	2.178	1.80	1	2			2	Single Family Detached	SINGLE FAMILY RESIDENCE	53	2	2.57	Yes	Yes
2271440400	703105	N	3.72		U1	R-1-6	7.26	1.06	1	5			5	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	60	5	0.33	Yes	Yes
2271440500	703074	N	3.72		U1	R-1-6	7.26	0.66	1	3			3	Single Family Detached	SINGLE FAMILY RESIDENCE	50	3	3.19	Yes	
2271440700	274957	N	3.72		U1	R-1-6	7.26	2.01	0	6			6	Single Family Multiple-Units	5 - 15 UNITS GENERIC	60	No Existing Units	1.44		Yes
2271442000	190464		-		U1	R-1-7	6.22	0.69	1	2			2	Single Family Detached	SINGLE FAMILY RESIDENCE	58	2	1.23	Yes	
2271442300	190467		-		U1	R-1-7	6.22	0.70	1	2			2	Single Family Detached	SINGLE FAMILY RESIDENCE	57	2	1.70	Yes	
2271700100	300334	X	1.48		U1	R-1-6	7.26	0.48	1	2			2	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	44	2	3.00	Yes	
2271700900	151317		-		U1	R-1-6	7.26	0.29	0	2			2	Arterial Commercial	GENERIC OFFICE/RETAIL 1-3 STORIES	69	No Existing Units	4.00		
2271701800	300351	X	1.48		U1	R-1-6	7.26	0.49	1	2			2	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	48	2	1.50	Yes	
2271701900	300335	X	1.48		U1	R-1-6	7.26	0.51	1	2			2	Single Family Detached	SINGLE FAMILY RESIDENCE	50	2	1.63	Yes	
2271802700	702300		-		S	R-1-10	4.356	2.08	0	7			7	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2273041200	151108		-	East Valley Specific Plan	Urban Residential IV/V	C-G	30	0.53	0	13	9		4	Arterial Commercial	CAR WASH	90	No Existing Units	1.56		
2273202600	702429		-		S	R-1-15	2.904	0.36	0	1			1	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		Yes
2273300100	702123		-		S	R-1-10	4.356	1.96	1	5			5	Spaced Rural Residential	SINGLE FAMILY RESIDENCE - GENERIC	78	5	0.32	Yes	Yes
2273407800	73590		-		U1	R-1-6	7.26	0.90	1	4			4	Single Family Detached	SINGLE FAMILY RESIDENCE	61	4	1.06		Yes
2273552400	274955	O	1.21		U1	R-1-6	7.26	0.72	1	3			3	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	47	3	2.10	Yes	
2273553000	703064	O	1.21		U1	R-1-6	7.26	0.49	1	2			2	Single Family Detached	SINGLE FAMILY RESIDENCE	60	2	2.67	Yes	

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2274104200	177283		-		U1	R-1-8	5.445	1.76	1	6			6	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	48	6	1.30	Yes	Yes
2274201000	151533	I	32.93		S	R-1-15	2.904	2.68	1	5			5	Spaced Rural Residential	SINGLE FAMILY RESIDENCE	67	5	1.67	Yes	
2274201100	701862	I	32.93		E2	RE-20	2.178	6.83	0	11			11	Orchard or Vineyard	AVOCADO	Unknown	No Existing Units	3.50	Yes	Yes
2274301500	73525	I	32.93		E2	RE-20	2.178	0.93	1	2			2	Spaced Rural Residential	VACANT RESIDENTIAL - GENERIC	Unknown	2	>1; \$0 Assessed Improvement Value	Yes	
2274302000	701555	I	32.93		M	RE-210/R-1-15	0.2074286	22.50	0	4			4	Orchard or Vineyard	AVOCADO	Unknown	No Existing Units	6.23	Yes	Yes
2274304800	1554202		-		E2	RE-20	2.178	1.19	0	2			2	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2275206600	137959		-		U1	R-1-8	5.445	1.03	1	3			3	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	8	3	1.22	Yes	Yes
2275207200	151571		-		U1	R-1-8	5.445	0.73	1	2			2	Single Family Detached	SINGLE FAMILY RESIDENCE	48	2	2.38	Yes	
2275821600	701636		-		E2	RE-20	2.178	1.48	1	1			1	Single Family Detached	SINGLE FAMILY RESIDENCE	93	1	1.22	Yes	Yes
2280206400	5282540		-		E2	RE-20	2.178	4.25	0	7			7	Religious Facility	INSTITUTIONAL - VACANT	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2280505100	180876	L	2.14		U1	R-1-10	4.356	1.10	1	3			3	Spaced Rural Residential	SINGLE FAMILY RESIDENCE	79	3	2.46	Yes	Yes
2280505200	703096	L	2.14		U1	R-1-8	5.445	1.03	0	4			4	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2280505500	5050617	M	1.82		U1	R-1-8	5.445	0.95	1	3			3	Single Family Detached	SINGLE FAMILY RESIDENCE	86	3	1.22	Yes	
2280506400	180878	M	1.82		U1	R-1-8	5.445	0.87	1	3			3	Single Family Detached	SINGLE FAMILY RESIDENCE	58	3	1.44	Yes	
2280601000	275052		-		U2	R-1-8	5.445	0.64	1	2			2	Single Family Detached	SINGLE FAMILY RESIDENCE	59	2	1.69		
2280601200	275054		-		U2	R-1-8	5.445	0.77	1	2			2	Single Family Detached	SINGLE FAMILY RESIDENCE	59	2	1.54		
2280602200	79040		-		U2	R-1-8	5.445	2.71	1	10			10	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	62	10	0.46	Yes	Yes
2280603000	79041		-		U2	R-1-8	5.445	0.66	1	2			2	Single Family Detached	SINGLE FAMILY RESIDENCE	76	2	1.80		
2280710100	704880		-		U1	R-1-8	5.445	0.79	1	2			2	Single Family Detached	SINGLE FAMILY RESIDENCE	58	2	1.89	Yes	

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2280732300	1543930		-		U2	R-2-12	12	0.55	0	5		5	FALSE	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	
2280800500	275035	Z	1.29		U2	R-2-12	12	0.41	1	3		3	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	56	3	1.30	Yes	
2280800600	275036	Z	1.29		U2	R-2-12	12	0.44	1	3		3	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	31	3	11.02	Yes	
2280801300	275040		-		U2	R-2-12	12	0.33	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	32	2	4.97		
2280801700	704522	Z	1.29		U2	R-2-12	12	0.44	1	3		3	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	55	3	3.75		
2280801900	704592		-		U2	R-2-12	12	0.28	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	45	2	1.33		
2285004900	704808		-		U1	R-1-8	5.445	0.80	1	2			2	Single Family Detached	SINGLE FAMILY RESIDENCE	47	2	1.73	Yes	
2290101800	704553		-		U2	R-2-12	12	0.29	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	48	2	3.55		
2290305800	100421		-		U2	R-2-12	12	1.13	0	10		10	FALSE	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2290401300	177216		-		U2	R-2-12	12	0.41	1	3		3	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	52	3	1.29		
2290610600	203247		-		U1	R-1-7	6.22	0.88	1	3			3	Single Family Detached	SINGLE FAMILY RESIDENCE	50	3	1.50	Yes	Yes
2290610900	203250		-		U1	R-1-7	6.22	0.89	1	3			3	Single Family Detached	SINGLE FAMILY RESIDENCE	35	3	3.00	Yes	Yes
2290620100	203239		-		U1	R-1-7	6.22	0.89	1	3			3	Single Family Detached	SINGLE FAMILY RESIDENCE W/GRANNY FLAT	76	3	2.38	Yes	
2290620800	203251		-		U1	R-1-7	6.22	0.93	1	3			3	Single Family Detached	SINGLE FAMILY RESIDENCE	58	3	4.00	Yes	
2290710800	203274		-		U1	R-1-7	6.22	0.92	1	3			3	Single Family Detached	SINGLE FAMILY RESIDENCE	59	3	1.22	Yes	
2290913800	193073		-		U1	R-1-7	6.22	0.55	1	2			2	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	37	2	1.30	Yes	
2291024800	704702		-		U2	R-2-12	12	0.35	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	47	2	1.55		
2291210300	275156	Y	1.24		U2	R-2-12	12	0.53	0	3		3	FALSE	Single Family Multiple-Units	2 - 4 UNITS - GENERIC	46	No Existing Units	1.76		Yes
2291210500	275157	Y	1.24		U2	R-2-12	12	0.40	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE W/GRANNY FLAT	60	2	2.07	Yes	
2291210600	275158	Y	1.24		U2	R-2-12	12	0.30	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	15	2	4.65	Yes	
2291421200	203234	AA	0.45		U3	R-3-18	18	0.22	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	61	2	1.30	Yes	

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2291421300	33093	AA	0.45		U3	R-3-18	18	0.23	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	25	2	5.66	Yes	
2291604200	5344397		-		U3	R-3-18	18	0.16	0	2		2	FALSE	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1 ; \$0 Assessed Improvement Value	Yes	
2291720300	705194	AC	0.71	Downtown SPA	SPA 9	S-P	100	0.34	0	17	12		5	Office (Low-Rise)	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	Unknown	No Existing Units	1.33		
2291722000	705461	AD	2.33	Downtown SPA	SPA 9	S-P	100	0.37	0	18	12		6	Office (Low-Rise)	FAST FOOD RESTAURANT	68	No Existing Units	7.50		
2291723000	705538	AD	2.33	Downtown SPA	SPA 9	S-P	100	0.42	0	20	14		6	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	71	No Existing Units	0.79		
2291723200	705494	AD	2.33	Downtown SPA	SPA 9	S-P	100	0.51	0	25	17		8	Arterial Commercial	GENERIC RESTAURANT/NIGHT CLUB/TAVERN	72	No Existing Units	1.43		
2291723500	705477	AD	2.33	Downtown SPA	SPA 9	S-P	100	0.35	0	17	12		5	Office (Low-Rise)	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	80	No Existing Units	0.31		
2291723600	705475	AD	2.33	Downtown SPA	SPA 9	S-P	100	0.36	0	17	12		5	Office (Low-Rise)	PARKING LOT MINIMAL IMPROVEMENTS	Unknown	No Existing Units	>1 ; \$0 Assessed Improvement Value		
2291724000	705511	AD	2.33	Downtown SPA	SPA 9	S-P	100	0.32	0	15	10		5	Service Station	SERVICE STATION - GENERIC	61	No Existing Units	6.15		
2291802100	5283137	AE	9.01	Downtown SPA	SPA 9	S-P	100	0.47	0	23	16		7	Neighborhood Shopping Center	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	88	No Existing Units	2.25		
2291802200	5283136	GT	8.11	Downtown SPA	SPA 9	S-P	100	0.87	0	44	30		14	Neighborhood Shopping Center	NEIGHBORHOOD SHOPPING CENTER	Unknown	No Existing Units	>1 ; \$0 Assessed Improvement Value		
2291803200	705153	GT	8.11	Downtown SPA	SPA 9	S-P	100	4.07	0	202	139		63	Neighborhood Shopping Center	NEIGHBORHOOD SHOPPING CENTER	62	No Existing Units	0.92		
2291803400	705134	GT	8.11	Downtown SPA	SPA 9	S-P	100	2.72	0	135	93		42	Neighborhood Shopping Center	NEIGHBORHOOD SHOPPING CENTER	61	No Existing Units	0.69		
2291803500	705438	GT	8.11	Downtown SPA	SPA 9	S-P	100	0.13	0	5	3		2	Arterial Commercial	NEIGHBORHOOD SHOPPING CENTER	61	No Existing Units	0.22		
2293050100	100542	AF	1.00	Downtown SPA	SPA 9	S-P	100	0.27	0	10	7		3	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	57	No Existing Units	1.17		

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2291806400	100533	AE	9.01	Downtown SPA	SPA 9	S-P	100	3.80	0	189	130		59	Neighborhood Shopping Center	GROCERY/DRUG LARGE CHAIN GENERIC	84	No Existing Units	0.70		
2291806500	100534	AE	9.01	Downtown SPA	SPA 9	S-P	100	0.94	0	46	32		14	Neighborhood Shopping Center	NEIGHBORHOOD SHOPPING CENTER	84	No Existing Units	1.40		
2291806900	100535	AE	9.01	Downtown SPA	SPA 9	S-P	100	0.47	0	22	15		7	Neighborhood Shopping Center	GENERIC RESTAURANT/NIGHT CLUB/TAVERN	88	No Existing Units	1.00		
2291807000	151123	AE	9.01	Downtown SPA	SPA 9	S-P	100	0.32	0	15	10		5	Neighborhood Shopping Center	GENERIC RESTAURANT/NIGHT CLUB/TAVERN	85	No Existing Units	1.11		
2291807800	100536	AE	9.01	Downtown SPA	SPA 9	S-P	100	1.05	0	51	35		16	Neighborhood Shopping Center	NEIGHBORHOOD SHOPPING CENTER	84	No Existing Units	1.40		
2291807900	100537	AE	9.01	Downtown SPA	SPA 9	S-P	100	0.49	0	24	17		7	Neighborhood Shopping Center	NEIGHBORHOOD SHOPPING CENTER	87	No Existing Units	1.45		
2291808000	100547	AE	9.01	Downtown SPA	SPA 9	S-P	100	0.42	0	20	14		6	Neighborhood Shopping Center	NEIGHBORHOOD SHOPPING CENTER	87	No Existing Units	1.33		
2291808400	100539	AE	9.01	Downtown SPA	SPA 9	S-P	100	1.04	0	51	35		16	Neighborhood Shopping Center	NEIGHBORHOOD SHOPPING CENTER	84	No Existing Units	1.43		
2291809100	705498	GT	8.11	Downtown SPA	SPA 9	S-P	100	0.33	0	15	10		5	Neighborhood Shopping Center	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	80	No Existing Units	0.40		
2292101100	340327		-		U3	R-3-18	18	0.24	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	96	2	1.69	Yes	
2292103900	5110570		-	Downtown SPA	SPA 9	S-P	100	0.58	0	28	19		9	Neighborhood Shopping Center	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	Unknown	No Existing Units	1.99		
2292200300	255000	AG	0.48		U3	R-3-18	18	0.20	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	47	2	2.48	Yes	
2292200700	255002		-		U3	R-3-18	18	0.23	0	3		3	FALSE	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1 ; \$0 Assessed Improvement Value	Yes	
2292204100	339954		-		U3	R-3-18	18	0.38	1	4		4	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	48	4	1.36	Yes	Yes
2292204200	255004	AG	0.48		U3	R-3-18	18	0.28	1	3		3	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	10	3	1.58	Yes	
2292300900	229286	AB	1.01		U3	R-3-18	18	0.21	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	59	2	1.02	Yes	

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2292301000	229287	AB	1.01		U3	R-3-18	18	0.20	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	59	2	1.02	Yes	
2292301100	229288	AB	1.01		U3	R-3-18	18	0.20	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	59	2	2.52		
2292301200	229289	AB	1.01		U3	R-3-18	18	0.20	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	59	2	3.11	Yes	
2292301300	229290	AB	1.01		U3	R-3-18	18	0.20	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	59	2	1.22	Yes	
2292410900	229305		-		U3	R-3-18	18	0.63	0	8		8	FALSE	Other Public Services	GENERIC- RADIO STATION/BANK/M ISC	79	No Existing Units	1.00		
2292602100	151126		-		U3	R-3-18	18	0.24	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	56	2	5.30	Yes	
2292721000	302219		-	Downtown SPA	SPA 9	S-P	100	2.13	0	107	74		33	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	99	No Existing Units	1.18	Yes	
2293010400	254983	AL	0.24	Downtown SPA	SPA 9	S-P	75	0.15	1	5		5	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	13	5	1.66	Yes	Yes
2293010500	254984	AL	0.24	Downtown SPA	SPA 9	S-P	75	0.08	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	15	2	1.40	Yes	Yes
2293011200	254986		-	Downtown SPA	SPA 9	S-P	75	0.15	1	5		5	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	59	5	0.41		Yes
2293020100	254987	AO	0.16	Downtown SPA	SPA 9	S-P	75	0.08	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	23	2	2.33	Yes	Yes
2293020600	705619	AN	0.38	Downtown SPA	SPA 9	S-P	75	0.20	0	6		6	FALSE	Single Family Multiple-Units	2 - 4 UNITS - GENERIC	59	No Existing Units	2.40		Yes
2293020700	418553	AN	0.38	Downtown SPA	SPA 9	S-P	75	0.18	1	6		6	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	16	6	1.81	Yes	Yes
2293021000	418555		-	Downtown SPA	SPA 9	S-P	75	0.10	1	3		3	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	13	3	2.37	Yes	Yes
2293021600	131707	AO	0.16	Downtown SPA	SPA 9	S-P	75	0.07	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	45	2	1.30	Yes	Yes
2293030700	705648	AM	0.74	Downtown SPA	SPA 9	S-P	100	0.17	0	7	5		2	Other Retail Trade and Strip Commercial	PARKING LOT MINIMAL IMPROVEMENTS	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2293030800	100407	AM	0.74	Downtown SPA	SPA 9	S-P	100	0.16	0	8	6		2	Other Retail Trade and Strip Commercial	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2293030900	100408	AM	0.74	Downtown SPA	SPA 9	S-P	100	0.16	0	7	5		2	Other Retail Trade and Strip Commercial	PARKING LOT MINIMAL IMPROVEMENTS	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes

Assessor Parcel Number	Parcel ID	Consolidated Site ID	Consolidated Area (Acres)	Specific Planning Area	General Plan	Zoning	Density	Site Area (Acres)	Existing Dwelling Units	Total New RHNA Units	New Lower Income Units	New Moderate Income Units	New Above Moderate Units	SANDAG Land Use	Assessor Land Use	Year Built	New Units / Existing Units Ratio	Land to Improvement Ratio	Fourth Cycle Site	Fifth Cycle Site
2293031000	100409	AM	0.74	Downtown SPA	SPA 9	S-P	100	0.26	0	13	9		4	Other Retail Trade and Strip Commercial	GENERIC RESTAURANT/NIGHT CLUB/TAVERN	65	No Existing Units	1.51	Yes	Yes
2293041400	705479	AH	0.82	Downtown SPA	SPA 9	S-P	100	0.17	0	9	6		3	Other Retail Trade and Strip Commercial	PARKING LOT MINIMAL IMPROVEMENTS	Unknown	No Existing Units	38.94		Yes
2293041500	705470	AH	0.82	Downtown SPA	SPA 9	S-P	100	0.16	0	8	6		2	Other Retail Trade and Strip Commercial	PARKING LOT MINIMAL IMPROVEMENTS	Unknown	No Existing Units	38.94		Yes
2293041600	100400	AH	0.82	Downtown SPA	SPA 9	S-P	100	0.19	0	10	7		3	Other Retail Trade and Strip Commercial	GARAGE PARKING LOT/USED CAR	Unknown	No Existing Units	1.54		Yes
2293041700	100401	AH	0.82	Downtown SPA	SPA 9	S-P	100	0.29	0	15	10		5	Other Retail Trade and Strip Commercial	GARAGE PARKING LOT/USED CAR	Unknown	No Existing Units	20.02		Yes
2293042500	100410		-	Downtown SPA	SPA 9	S-P	100	0.16	0	7		7	FALSE	Other Retail Trade and Strip Commercial	MEDICAL-DENTAL OFFICE	77	No Existing Units	0.83		Yes
2293042700	131706	AK	0.54	Downtown SPA	SPA 9	S-P	75	0.10	1	3	2		1	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	17	3	12.52	Yes	Yes
2293042900	705478	AI	1.07	Downtown SPA	SPA 9	S-P	100	0.29	0	15	10		5	Arterial Commercial	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1 ; \$0 Assessed Improvement Value		Yes
2294311600	213433			Downtown SPA	SPA 9	S-P	75	0.08	0	2	1		1	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	45	No Existing Units	0.40		Yes
2293043900	418552	AI	1.07	Downtown SPA	SPA 9	S-P	100	0.17	0	7	5		2	Arterial Commercial	AUTOMOTIVE REPAIR GARAGES	60	No Existing Units	2.00		Yes
2293044000	418560	AK	0.54	Downtown SPA	SPA 9	S-P	75	0.23	1	7	5		2	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	25	7	3.20	Yes	Yes
2293044100	1565497	AK	0.54	Downtown SPA	SPA 9	S-P	75	0.21	1	7	5		2	Single Family Detached	SINGLE FAMILY RESIDENCE	47	7	6.00	Yes	Yes
2293044200	705219	AI	1.07	Downtown SPA	SPA 9	S-P	100	0.61	0	31	21		10	Other Retail Trade and Strip Commercial	MISC INST	Unknown	No Existing Units	1.32		Yes
2293050300	5110602	AF	1.00	Downtown SPA	SPA 9	S-P	100	0.19	0	9	6		3	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	58	No Existing Units	0.50		
2293051300	5110603	AF	1.00	Downtown SPA	SPA 9	S-P	100	0.32	0	15	10		5	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	88	No Existing Units	2.07		
2293101600	345263		-	Downtown SPA	SPA 9	S-P	75	0.16	0	5		5	FALSE	Arterial Commercial	AUTOMOTIVE REPAIR GARAGES	77	No Existing Units	5.33		Yes

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2293102000	345264	AV	0.50	Downtown SPA	SPA 9	S-P	75	0.16	1	5		5	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	57	5	3.00		Yes
2293102200	345266	AW	0.97	Downtown SPA	SPA 9	S-P	75	0.32	0	12	8		4	Vacant and Undeveloped Land	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		Yes
2293102300	345288	AW	0.97	Downtown SPA	SPA 9	S-P	75	0.16	1	5	3		2	Single Family Detached	SINGLE FAMILY RESIDENCE	42	5	11.88		Yes
2293102400	345289	AW	0.97	Downtown SPA	SPA 9	S-P	75	0.18	1	7	5		2	Single Family Detached	SINGLE FAMILY RESIDENCE	32	7	>1; \$0 Assessed Improvement Value		Yes
2293102500	345290	AW	0.97	Downtown SPA	SPA 9	S-P	75	0.16	0	6	4		2	Vacant and Undeveloped Land	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		Yes
2293102600	345291	AW	0.97	Downtown SPA	SPA 9	S-P	75	0.17	0	6	4		2	Parking Lot - Surface	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		Yes
2293103000	345292	AX	0.60	Downtown SPA	SPA 9	S-P	75	0.16	0	6	4		2	Vacant and Undeveloped Land	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		Yes
2293103100	345293	AX	0.60	Downtown SPA	SPA 9	S-P	75	0.44	0	16	11		5	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	Unknown	No Existing Units	3.60		Yes
2293104500	345267	AV	0.50	Downtown SPA	SPA 9	S-P	75	0.33	0	9		9	FALSE	Arterial Commercial	AUTOMOTIVE REPAIR GARAGES	Unknown	No Existing Units	2.75		Yes
2293104600	254991		-	Downtown SPA	SPA 9	S-P	75	0.61	1	22	15		7	Single Family Detached	SINGLE FAMILY RESIDENCE	56	22	1.43		
2293108300	151080	AJ	0.80	Downtown SPA	SPA 9	S-P	75	0.27	0	9	6		3	Office (Low-Rise)	1 - 3 STORY OFFICE ONLY	86	No Existing Units	1.16	Yes	Yes
2293108400	151081	AJ	0.80	Downtown SPA	SPA 9	S-P	75	0.37	0	13	9		4	Office (Low-Rise)	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	74	No Existing Units	2.30	Yes	Yes
2293108900	151076	AJ	0.80	Downtown SPA	SPA 9	S-P	75	0.16	1	5	3		2	Single Family Detached	SINGLE FAMILY RESIDENCE	5	5	1.22	Yes	Yes
2293201300	705435		-	East Valley Specific Plan	Mixed Use	C-G	80	0.36	0	16		16	FALSE	Other Health Care	GENERIC MEDICAL/DENTAL OFFICE	90	No Existing Units	4.30		
2293311600	124874	AR	3.50	Downtown SPA	SPA 9	S-P	100	2.57	0	128	88		40	Warehousing	WAREHOUSE-PROCESSING/STORAGE/DISTRIBUTION	84	No Existing Units	0.14		Yes
2293311700	124875	AR	3.50	Downtown SPA	SPA 9	S-P	100	0.92	0	45	31		14	Office (Low-Rise)	GENERIC RESTAURANT/NIGHT CLUB/TAVERN	76	No Existing Units	0.11		Yes

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2293610500	705676	AT	1.04	Downtown SPA	SPA 9	S-P	75	0.15	0	6	4		2	Parking Lot - Surface	GARAGE PARKING LOT/USED CAR	Unknown	No Existing Units	14.29	Yes	Yes
2293610600	345272	AT	1.04	Downtown SPA	SPA 9	S-P	75	0.15	0	5	3		2	Parking Lot - Surface	GARAGE PARKING LOT/USED CAR	Unknown	No Existing Units	14.29	Yes	Yes
2293610900	345273	AT	1.04	Downtown SPA	SPA 9	S-P	75	0.16	1	5	3		2	Single Family Detached	OFFICE/RETAIL BUILDING	45	5	0.54	Yes	Yes
2293611100	5241396	AT	1.04	Downtown SPA	SPA 9	S-P	75	0.42	0	15	10		5	Religious Facility	CHURCH	44	No Existing Units	0.80		Yes
2293611200	5241395	AT	1.04	Downtown SPA	SPA 9	S-P	75	0.16	1	5	3		2	Single Family Detached	SINGLE FAMILY RESIDENCE	48	5	2.00		Yes
2293620100	705657	AU	1.08	Downtown SPA	SPA 9	S-P	75	0.16	0	6	4		2	Parking Lot - Surface	GARAGE PARKING LOT/USED CAR	Unknown	No Existing Units	14.29		Yes
2293620200	705649	AU	1.08	Downtown SPA	SPA 9	S-P	75	0.16	0	6	4		2	Parking Lot - Surface	GARAGE PARKING LOT/USED CAR	Unknown	No Existing Units	14.29		Yes
2293620300	705640	AU	1.08	Downtown SPA	SPA 9	S-P	75	0.15	0	6	4		2	Parking Lot - Surface	GARAGE PARKING LOT/USED CAR	Unknown	No Existing Units	14.29		Yes
2293620400	705631	AU	1.08	Downtown SPA	SPA 9	S-P	75	0.15	0	6	4		2	Park - Active	GARAGE PARKING LOT/USED CAR	Unknown	No Existing Units	>1 ; \$0 Assessed Improvement Value		Yes
2293620500	705623	AU	1.08	Downtown SPA	SPA 9	S-P	75	0.15	0	6	4		2	Park - Active	GARAGE PARKING LOT/USED CAR	Unknown	No Existing Units	>1 ; \$0 Assessed Improvement Value		Yes
2293620600	345277	AU	1.08	Downtown SPA	SPA 9	S-P	75	0.16	1	5	3		2	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	46	5	10.00		Yes
2293620700	345278	AU	1.08	Downtown SPA	SPA 9	S-P	75	0.15	1	5	3		2	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	46	5	6.67		Yes
2293820700	705814	BK	1.37	Downtown SPA	SPA 9	S-P	75	0.09	0	3	2		1	Office (Low-Rise)	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1 ; \$0 Assessed Improvement Value	Yes	Yes
2293820900	256041	BK	1.37	Downtown SPA	SPA 9	S-P	75	0.25	0	9	6		3	Office (Low-Rise)	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1 ; \$0 Assessed Improvement Value	Yes	Yes
2293821300	5246864	BK	1.37	Downtown SPA	SPA 9	S-P	75	0.19	0	6	4		2	Other Retail Trade and Strip Commercial	COMMERCIAL OFFICE/RETAIL 1-3 STORIES	48	No Existing Units	3.20		Yes
2293821400	5246865	BK	1.37	Downtown SPA	SPA 9	S-P	75	0.11	0	3	2		1	Other Retail Trade and Strip Commercial	COMMERCIAL OFFICE/RETAIL 1-3 STORIES	23	No Existing Units	1.43		Yes

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2293920300	705629	BL	1.30	Downtown SPA	SPA 9	S-P	75	0.16	0	6	4		2	Other Retail Trade and Strip Commercial	GARAGE PARKING LOT/USED CAR	Unknown	No Existing Units	11.80	Yes	Yes
2293920400	345269	BL	1.30	Downtown SPA	SPA 9	S-P	75	0.16	0	5	3		2	Other Retail Trade and Strip Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	66	No Existing Units	0.35		Yes
2293921000	705663	BM	1.29	Downtown SPA	SPA 9	S-P	75	0.08	0	3	2		1	Other Retail Trade and Strip Commercial	VACANT LAND COMMERCIAL	Unknown	No Existing Units	22.34	Yes	Yes
2293921100	705664	BM	1.29	Downtown SPA	SPA 9	S-P	75	0.08	0	3	2		1	Other Retail Trade and Strip Commercial	VACANT LAND COMMERCIAL	Unknown	No Existing Units	22.34	Yes	Yes
2293921200	705668	BM	1.29	Downtown SPA	SPA 9	S-P	75	0.09	0	3	2		1	Other Retail Trade and Strip Commercial	VACANT LAND COMMERCIAL	Unknown	No Existing Units	22.34	Yes	Yes
2293921300	705672	BM	1.29	Downtown SPA	SPA 9	S-P	75	0.23	0	8	6		2	Other Retail Trade and Strip Commercial	1 - 3 STORY OFFICE ONLY	75	No Existing Units	0.52	Yes	Yes
2293921700	345270	BL	1.30	Downtown SPA	SPA 9	S-P	75	0.17	0	5	3		2	Other Retail Trade and Strip Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	64	No Existing Units	0.40		Yes
2293921800	705652	BM	1.29	Downtown SPA	SPA 9	S-P	75	0.24	0	8	6		2	Other Retail Trade and Strip Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	59	No Existing Units	0.94	Yes	Yes
2293921900	87424	BM	1.29	Downtown SPA	SPA 9	S-P	75	0.25	0	8	6		2	Other Retail Trade and Strip Commercial	AUTOMOTIVE REPAIR GARAGES	60	No Existing Units	0.57	Yes	Yes
2293922000	705645	BM	1.29	Downtown SPA	SPA 9	S-P	75	0.16	0	5	3		2	Automobile Dealership	USED CAR LOT	Unknown	No Existing Units	6.43	Yes	Yes
2293922100	705635	BM	1.29	Downtown SPA	SPA 9	S-P	75	0.17	0	6	4		2	Automobile Dealership	USED CAR LOT	Unknown	No Existing Units	90.10	Yes	Yes
2293922200	705597	BL	1.30	Downtown SPA	SPA 9	S-P	75	0.16	0	5	3		2	Other Retail Trade and Strip Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	64	No Existing Units	0.61		Yes
2293922300	345271	BL	1.30	Downtown SPA	SPA 9	S-P	75	0.31	0	10	7		3	Other Retail Trade and Strip Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	73	No Existing Units	0.35		Yes
2293922400	345268	BL	1.30	Downtown SPA	SPA 9	S-P	75	0.33	0	11	8		3	Other Retail Trade and Strip Commercial	AUTOMOTIVE REPAIR GARAGES	67	No Existing Units	0.92		Yes
2294011400	213781	AS	1.15	Downtown SPA	SPA 9	S-P	100	0.16	0	7	5		2	Industrial Park	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	65	No Existing Units	0.96	Yes	Yes

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2294011500	213782	AS	1.15	Downtown SPA	SPA 9	S-P	100	0.49	0	24	17		7	Vacant and Undeveloped Land	VACANT INDUSTRIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2294011600	213783	AS	1.15	Downtown SPA	SPA 9	S-P	100	0.50	0	24	17		7	Office (Low-Rise)	MISC INDUSTRY/SPECIAL	81	No Existing Units	1.42	Yes	Yes
2294011700	124877		-	Downtown SPA	SPA 9	S-P	100	0.47	0	24		24	FALSE	Industrial Park	STORAGE BULK CHEMICAL/OIL REFINERY	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2294120500	213747		-	Downtown SPA	SPA 9	S-P	75	0.16	0	5		5	FALSE	Office (Low-Rise)	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	62	No Existing Units	0.42		Yes
2294211200	213760		-	Downtown SPA	SPA 9	S-P	75	0.16	0	5		5	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	70	No Existing Units	0.32		Yes
2294211400	213761	CB	0.33	Downtown SPA	SPA 9	S-P	75	0.08	0	2		2	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	21	No Existing Units	1.25	Yes	Yes
2294211500	213762	CB	0.33	Downtown SPA	SPA 9	S-P	75	0.08	0	2		2	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	35	No Existing Units	1.88	Yes	Yes
2294211600	213763	CB	0.33	Downtown SPA	SPA 9	S-P	75	0.08	0	2		2	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	70	No Existing Units	2.23	Yes	Yes
2294211700	213764	CB	0.33	Downtown SPA	SPA 9	S-P	75	0.09	0	2		2	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	70	No Existing Units	2.69		Yes
2294211900	213766	CA	0.31	Downtown SPA	SPA 9	S-P	75	0.08	0	2		2	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	Unknown	No Existing Units	1.17		Yes
2294212400	213767	CA	0.31	Downtown SPA	SPA 9	S-P	75	0.23	0	8		8	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	52	No Existing Units	1.13	Yes	Yes
2294220800	213449		-	Downtown SPA	SPA 9	S-P	75	0.24	0	8		8	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	39	No Existing Units	2.15	Yes	Yes
2294221000	213450		-	Downtown SPA	SPA 9	S-P	75	0.08	0	3		3	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	Unknown	No Existing Units	2.44	Yes	Yes

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2294221800	100414	-	-	Downtown SPA	SPA 9	S-P	75	0.21	0	8		8	FALSE	Arterial Commercial	PARKING LOT MINIMAL IMPROVEMENTS	Unknown	No Existing Units	21.82	Yes	Yes
2294222600	100413	-	-	Downtown SPA	SPA 9	S-P	75	0.52	0	18	12		6	Arterial Commercial	GENERIC- RADIO STATION/BANK/M ISC	80	No Existing Units	0.45		Yes
2294310100	256044	CG	0.30	Downtown SPA	SPA 9	S-P	75	0.14	0	4		4	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	46	No Existing Units	1.00	Yes	Yes
2294310300	705848	CG	0.30	Downtown SPA	SPA 9	S-P	75	0.16	0	5		5	FALSE	Arterial Commercial	AUTOMOTIVE REPAIR GARAGES	77	No Existing Units	2.17	Yes	Yes
2294310700	705810	CH	0.24	Downtown SPA	SPA 9	S-P	75	0.16	0	5		5	FALSE	Arterial Commercial	OFFICE/RETAIL BUILDING	35	No Existing Units	0.86		Yes
2294310800	705801	CH	0.24	Downtown SPA	SPA 9	S-P	75	0.08	0	2		2	FALSE	Arterial Commercial	RESTAURANT - INDEPENDENT	48	No Existing Units	1.45	Yes	Yes
2294311000	213430	CJ	0.95	Downtown SPA	SPA 9	S-P	75	0.16	0	5	3		2	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	45	No Existing Units	0.37		Yes
2294311100	213431	CJ	0.95	Downtown SPA	SPA 9	S-P	75	0.15	0	5	3		2	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	70	No Existing Units	0.68		Yes
2294311500	213432	CJ	0.95	Downtown SPA	SPA 9	S-P	75	0.16	0	5	3		2	Arterial Commercial	OFFICE/RETAIL BUILDING	46	No Existing Units	0.38		Yes
2294311700	213434	CI	0.24	Downtown SPA	SPA 9	S-P	75	0.08	0	2		2	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	60	No Existing Units	1.11		Yes
2294311800	256046	CI	0.24	Downtown SPA	SPA 9	S-P	75	0.17	0	6		6	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	Unknown	No Existing Units	1.63	Yes	Yes
2294311900	213435	CJ	0.95	Downtown SPA	SPA 9	S-P	75	0.16	0	5	3		2	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	52	No Existing Units	0.63		Yes
2294312000	213750	CJ	0.95	Downtown SPA	SPA 9	S-P	75	0.16	0	6	4		2	Arterial Commercial	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1 ; \$0 Assessed Improvement Value	Yes	Yes
2294312100	213436	CJ	0.95	Downtown SPA	SPA 9	S-P	75	0.15	0	5	3		2	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	40	No Existing Units	0.18	Yes	Yes

Assessor Parcel Number	Parcel ID	Consolidated Site ID	Consolidated Area (Acres)	Specific Planning Area	General Plan	Zoning	Density	Site Area (Acres)	Existing Dwelling Units	Total New RHNA Units	New Lower Income Units	New Moderate Income Units	New Above Moderate Units	SANDAG Land Use	Assessor Land Use	Year Built	New Units / Existing Units Ratio	Land to Improvement Ratio	Fourth Cycle Site	Fifth Cycle Site
2294320700	705722	CK	0.33	Downtown SPA	SPA 9	S-P	75	0.16	0	5		5	FALSE	Office (Low-Rise)	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	58	No Existing Units	0.90		Yes
2294320800	705709	CK	0.33	Downtown SPA	SPA 9	S-P	75	0.16	0	5		5	FALSE	Office (Low-Rise)	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	60	No Existing Units	0.88		Yes
2294321600	213494	CM	0.25	Downtown SPA	SPA 9	S-P	75	0.08	0	3		3	FALSE	Office (Low-Rise)	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	81	No Existing Units	0.18		Yes
2294321800	213495	CL	0.40	Downtown SPA	SPA 9	S-P	75	0.08	0	2		2	FALSE	Office (Low-Rise)	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	Unknown	No Existing Units	2.15	Yes	Yes
2294321900	213496	CL	0.40	Downtown SPA	SPA 9	S-P	75	0.07	0	2		2	FALSE	Office (Low-Rise)	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	55	No Existing Units	1.33	Yes	Yes
2294322000	213497	CL	0.40	Downtown SPA	SPA 9	S-P	75	0.16	0	5		5	FALSE	Office (Low-Rise)	GENERIC RESTAURANT/NIGHT CLUB/TAVERN	63	No Existing Units	0.74		Yes
2294322100	213498	CL	0.40	Downtown SPA	SPA 9	S-P	75	0.08	0	2		2	FALSE	Office (Low-Rise)	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	50	No Existing Units	2.67	Yes	Yes
2294322800	213503	CM	0.25	Downtown SPA	SPA 9	S-P	75	0.17	0	5		5	FALSE	Office (Low-Rise)	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	65	No Existing Units	1.11	Yes	Yes
2294322900	5044115		-	Downtown SPA	SPA 9	S-P	75	0.33	0	11		11	FALSE	Office (Low-Rise)	SINGLE TENANT STAND ALONE RETAIL BLDG	73	No Existing Units	2.05	Yes	Yes
2294410500	705606		-	Downtown SPA	SPA 9	S-P	75	0.32	0	11		11	FALSE	Other Retail Trade and Strip Commercial	CAR WASH	57	No Existing Units	1.45	Yes	Yes
2294410800	705574		-	Downtown SPA	SPA 9	S-P	75	0.32	0	12		12	FALSE	Other Retail Trade and Strip Commercial	GENERIC RESTAURANT/NIGHT CLUB/TAVERN	Unknown	No Existing Units	1.12	Yes	Yes
2294420100	87443	CN	1.48	Downtown SPA	SPA 9	S-P	75	0.10	0	3	2		1	Office (Low-Rise)		34	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2294420200	705638	CN	1.48	Downtown SPA	SPA 9	S-P	75	0.17	0	3	2		1	Office (Low-Rise)		Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2294420300	705653	CN	1.48	Downtown SPA	SPA 9	S-P	75	0.18	0	7	5		2	Office (Low-Rise)		Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes

Assessor Parcel Number	Parcel ID	Consolidated Site ID	Consolidated Area (Acres)	Specific Planning Area	General Plan	Zoning	Density	Site Area (Acres)	Existing Dwelling Units	Total New RHNA Units	New Lower Income Units	New Moderate Income Units	New Above Moderate Units	SANDAG Land Use	Assessor Land Use	Year Built	New Units / Existing Units Ratio	Land to Improvement Value Ratio	Fourth Cycle Site	Fifth Cycle Site
2294420400	87428	CN	1.48	Downtown SPA	SPA 9	S-P	75	0.25	0	5	3		2	Single Family Multiple-Units		52	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2294420900	705705	CN	1.48	Downtown SPA	SPA 9	S-P	75	0.09	0	3	2		1	Office (Low-Rise)	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2294421000	213514	CN	1.48	Downtown SPA	SPA 9	S-P	75	0.14	0	5	3		2	Office (Low-Rise)	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	55	No Existing Units	0.82		Yes
2294421600	213515	CN	1.48	Downtown SPA	SPA 9	S-P	75	0.17	0	5	3		2	Office (Low-Rise)	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	51	No Existing Units	1.35	Yes	Yes
2294421700	705651		-	Downtown SPA	SPA 9	S-P	75	0.53	0	19	13		6	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	57	No Existing Units	0.65		Yes
2294421800	213511	CN	1.48	Downtown SPA	SPA 9	S-P	75	0.39	0	14	10		4	Office (Low-Rise)		73	No Existing Units	>1; \$0 Assessed Improvement Value		Yes
2294610400	213505	DM	0.97	Downtown SPA	SPA 9	S-P	75	0.16	0	6	4		2	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	Unknown	No Existing Units	1.64	Yes	Yes
2294610500	213506	DM	0.97	Downtown SPA	SPA 9	S-P	75	0.16	0	5	3		2	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	50	No Existing Units	0.61		Yes
2294611200	213507	DN	0.97	Downtown SPA	SPA 9	S-P	75	0.16	0	6	4		2	Parking Lot - Surface	GENERIC- RADIO STATION/BANK/M ISC	Unknown	No Existing Units	24.38	Yes	Yes
2294611300	23245	DN	0.97	Downtown SPA	SPA 9	S-P	75	0.16	0	6	4		2	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	Unknown	No Existing Units	16.40	Yes	Yes
2294611600	255143	DN	0.97	Downtown SPA	SPA 9	S-P	75	0.32	0	11	8		3	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	60	No Existing Units	0.57		Yes
2294611800	213509	DM	0.97	Downtown SPA	SPA 9	S-P	75	0.08	0	2	1		1	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	70	No Existing Units	1.00		Yes
2294612000	705847	DM	0.97	Downtown SPA	SPA 9	S-P	75	0.25	0	9	6		3	Parking Lot - Surface	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes

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2294612100	213510	DM	0.97	Downtown SPA	SPA 9	S-P	75	0.32	0	11	8		3	Other School	1 - 3 STORY OFFICE ONLY	76	No Existing Units	0.33		Yes
2294612200	705908	DN	0.97	Downtown SPA	SPA 9	S-P	75	0.32	0	11	8		3	Arterial Commercial	1 - 3 STORY OFFICE ONLY	73	No Existing Units	1.25		Yes
2294620400	705795		-	Downtown SPA	SPA 9	S-P	75	0.08	0	3		3	FALSE	Parking Lot - Surface	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2294622000	705783		-	Downtown SPA	SPA 9	S-P	75	0.16	0	5		5	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	74	No Existing Units	0.80		Yes
2294622400	213513		-	Downtown SPA	SPA 9	S-P	75	0.32	0	11		11	FALSE	Other Health Care	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	73	No Existing Units	0.52		Yes
2294710100	255138	DO	0.96	Downtown SPA	SPA 9	S-P	75	0.12	0	4	3		1	Arterial Commercial	GENERIC MEDICAL/DENTAL OFFICE	57	No Existing Units	0.94		Yes
2294711400	255139	DO	0.96	Downtown SPA	SPA 9	S-P	75	0.10	1	3	2		1	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	18	3	17.57	Yes	Yes
2294711500	26684	DO	0.96	Downtown SPA	SPA 9	S-P	75	0.25	0	8	6		2	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	Unknown	No Existing Units	4.00	Yes	Yes
2294711600	255140	DO	0.96	Downtown SPA	SPA 9	S-P	75	0.49	0	17	12		5	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	74	No Existing Units	0.25		Yes
2294720400	706089	DP	0.40	Downtown SPA	SPA 9	S-P	45	0.10	0	3		3	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	37	No Existing Units	2.44		Yes
2294720500	706070	DP	0.40	Downtown SPA	SPA 9	S-P	45	0.08	1	2		2	FALSE	Single Family Detached	1 - 3 STORY OFFICE ONLY	58	2	2.51		Yes
2294720600	706045	DP	0.40	Downtown SPA	SPA 9	S-P	45	0.21	0	3		3	FALSE	Single Family Multiple-Units	2 - 4 UNITS - GENERIC	35	No Existing Units	1.82		Yes
2294721000	255099	DR	0.96	Downtown SPA	SPA 9	S-P	45	0.28	0	9	6		3	Arterial Commercial	1 - 3 STORY OFFICE ONLY	73	No Existing Units	0.72		Yes
2294721100	255100	DR	0.96	Downtown SPA	SPA 9	S-P	45	0.68	0	22	15		7	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	71	No Existing Units	0.70		Yes
2294910600	23248	DL	0.70	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.18	1	3	2		1	Single Family Detached	SINGLE FAMILY RESIDENCE	18	3	2.81		
2294910700	23249	DL	0.70	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.17	1	3	2		1	Single Family Detached	SINGLE FAMILY RESIDENCE	8	3	1.09		

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2294910800	23250	DL	0.70	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.18	1	3	2		1	Single Family Detached	SINGLE FAMILY RESIDENCE	31	3	1.17		
2294910900	23251	DL	0.70	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.18	1	3	2		1	Single Family Detached	SINGLE FAMILY RESIDENCE	24	3	1.07		
2295010100	255117	DQ	0.37	Downtown SPA	SPA 9	S-P	45	0.15	0	4		4	FALSE	Office (Low-Rise)	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	48	No Existing Units	1.64		Yes
2295010200	28232	DQ	0.37	Downtown SPA	SPA 9	S-P	45	0.09	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	53	2	1.06		Yes
2295010500	706172	DQ	0.37	Downtown SPA	SPA 9	S-P	45	0.13	0	4		4	FALSE	Parking Lot - Surface	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		Yes
2295010700	706196	-	-	Downtown SPA	SPA 9	S-P	45	0.08	1	2		2	FALSE	Single Family Detached	MILLS ACT (SINGLE FAM OWNER OCCUPIED)	24	2	1.50		Yes
2295010900	29664	-	-	Downtown SPA	SPA 9	S-P	45	0.18	1	5		5	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	48	5	0.63		Yes
2295122100	706052	-	-		U2	R-2-12	12	0.17	0	2		2	FALSE	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2300101000	274948	-	-		U2	R-2-12	12	0.33	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	47	2	1.43	Yes	
2300101700	704226	-	-		U2	R-2-12	12	0.45	1	3		3	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	60	3	1.42	Yes	Yes
2300108000	704079	-	-		U2	R-2-12	12	0.37	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	59	2	1.20	Yes	
2300412000	180424	-	-		U3	R-3-18	18	0.21	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	55	2	1.05	Yes	
2300520700	151287	-	-		U3	R-3-18	18	0.47	1	5		5	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	36	5	7.06	Yes	Yes
2300811300	704580	-	-	East Valley Specific Plan	Urban Residential IV/V	C-G	30	0.15	0	4		4	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	Unknown	No Existing Units	42.64		
2300820200	151297	BB	0.40	East Valley Specific Plan	Urban Residential IV/V	C-G	30	0.14	0	4		4	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	64	No Existing Units	1.06		
2300822700	151298	BB	0.40	East Valley Specific Plan	Urban Residential IV/V	C-G	30	0.26	0	7		7	FALSE	Service Station	SERVICE STATION - GENERIC	Unknown	No Existing Units	1.62		
2300910800	5336893	AY	2.65	East Valley Specific Plan	Mixed Use	C-P	80	0.81	0	36	25		11	Government Office/Civic Center		Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		

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2300910900	5334378	AY	2.65	East Valley Specific Plan	Mixed Use	C-P	80	1.84	0	83	57		26	Government Office/Civic Center		Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2300921000	87476	BD	1.13	East Valley Specific Plan	Mixed Use	C-G	80	0.16	0	7	5		2	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	Unknown	No Existing Units	3.71		
2300921100	705098	BD	1.13	East Valley Specific Plan	Mixed Use	C-G	80	0.15	0	7	5		2	Arterial Commercial	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2300921200	87477	BD	1.13	East Valley Specific Plan	Mixed Use	C-G	80	0.31	0	14	10		4	Other Health Care	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	80	No Existing Units	1.79		
2300921300	87478	BD	1.13	East Valley Specific Plan	Mixed Use	C-G	80	0.41	0	19	13		6	Other Health Care	AUTOMOTIVE REPAIR GARAGES	60	No Existing Units	1.60		
2300921400	193134	BD	1.13	East Valley Specific Plan	Mixed Use	C-G	80	0.09	0	4	3		1	Other Health Care	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	78	No Existing Units	2.07		
2300921500	705066	BC	0.65	East Valley Specific Plan	Mixed Use	C-G	80	0.10	0	4	3		1	Other Health Care	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2300921700	180150	BC	0.65	East Valley Specific Plan	Mixed Use	C-G	80	0.12	0	5	3		2	Other Health Care	GENERIC MEDICAL/DENTAL OFFICE	80	No Existing Units	0.42		
2300921900	705080	BC	0.65	East Valley Specific Plan	Mixed Use	C-G	80	0.15	0	7	5		2	Parking Lot - Surface	PARKING LOT MINIMAL IMPROVEMENTS	Unknown	No Existing Units	2.11		
2300922600	705068	BC	0.65	East Valley Specific Plan	Mixed Use	C-G	80	0.13	0	6	4		2	Parking Lot - Surface	PARKING LOT MINIMAL IMPROVEMENTS	Unknown	No Existing Units	1.83		
2300922700	705052	BC	0.65	East Valley Specific Plan	Mixed Use	C-G	80	0.16	0	7	5		2	Other Health Care	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2300930100	87479	BP	0.73	East Valley Specific Plan	Mixed Use	C-G	80	0.11	0	5	3		2	Arterial Commercial	SINGLE TENANT STAND ALONE RETAIL BLDG	63	No Existing Units	3.33		
2300930200	87480	BP	0.73	East Valley Specific Plan	Mixed Use	C-G	80	0.11	0	5	3		2	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	53	No Existing Units	6.46		
2300930300	87481	BP	0.73	East Valley Specific Plan	Mixed Use	C-G	80	0.11	0	5	3		2	Arterial Commercial	SINGLE TENANT STAND ALONE RETAIL BLDG	62	No Existing Units	2.00		

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2300930400	87482	BP	0.73	East Valley Specific Plan	Mixed Use	C-G	80	0.13	0	6	4		2	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	Unknown	No Existing Units	2.54		
2300930500	87483	BP	0.73	East Valley Specific Plan	Mixed Use	C-G	80	0.14	0	6	4		2	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	62	No Existing Units	1.52		
2300930600	87484	BP	0.73	East Valley Specific Plan	Mixed Use	C-G	80	0.14	0	7	5		2	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	62	No Existing Units	1.71		
2300940200	87461	BO	0.12	East Valley Specific Plan	Mixed Use	C-G	80	0.03	0	1		1	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	Unknown	No Existing Units	1.50		
2300940300	87462	BO	0.12	East Valley Specific Plan	Mixed Use	C-G	80	0.03	0	1		1	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	Unknown	No Existing Units	1.38		
2300940400	87463	BO	0.12	East Valley Specific Plan	Mixed Use	C-G	80	0.06	0	3		3	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	Unknown	No Existing Units	3.59		
2300940600	87465		-	East Valley Specific Plan	Mixed Use	C-G	80	0.07	0	3		3	FALSE	Arterial Commercial	GENERIC RESTAURANT/NIG HT CLUB/TAVERN	Unknown	No Existing Units	1.84		
2300940800	705471	BN	0.10	East Valley Specific Plan	Mixed Use	C-G	80	0.04	0	2		2	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	54	No Existing Units	1.71		
2300940900	87466	BN	0.10	East Valley Specific Plan	Mixed Use	C-G	80	0.06	0	3		3	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	59	No Existing Units	1.23		
2301010800	215295		-		U3	R-3-18	18	0.20	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	48	2	1.22	Yes	
2301011100	229315		-		U3	R-3-18	18	0.24	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	46	2	3.08	Yes	
2301020300	151130		-		U3	R-3-18	18	0.18	1	1		1	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	53	1	1.95	Yes	Yes
2301040300	180148	AZ	0.66		U3	R-3-18	18	0.19	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	58	2	4.00		
2301040400	151185	AZ	0.66		U3	R-3-18	18	0.28	1	3		3	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	57	3	1.61		
2301040500	151186	AZ	0.66		U3	R-3-18	18	0.19	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	55	2	1.43	Yes	
2301042800	87468	BE	1.67	East Valley Specific Plan	Mixed Use	C-G	80	0.28	0	13	9		4	Arterial Commercial	GENERIC RESTAURANT/NIG HT CLUB/TAVERN	78	No Existing Units	1.50		

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2301042900	180151	BE	1.67	East Valley Specific Plan	Mixed Use	C-G	80	0.52	0	23	16		7	Other Health Care	MEDICAL-DENTAL OFFICE	86	No Existing Units	0.87		
2301043500	87469	BE	1.67	East Valley Specific Plan	Mixed Use	C-G	80	0.14	0	6	4		2	Arterial Commercial	AUTO SALES/SERVICE AGENCY	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2301043600	705053	BE	1.67	East Valley Specific Plan	Mixed Use	C-G	80	0.15	0	7	5		2	Arterial Commercial	AUTO SALES/SERVICE AGENCY	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2301043700	705047	BE	1.67	East Valley Specific Plan	Mixed Use	C-G	80	0.14	0	6	4		2	Arterial Commercial	AUTO SALES/SERVICE AGENCY	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2301043800	87470	BE	1.67	East Valley Specific Plan	Mixed Use	C-G	80	0.44	0	20	14		6	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	75	No Existing Units	1.37		
2301110700	87471	BQ	1.23	East Valley Specific Plan	Mixed Use	C-G	80	0.31	0	14	10		4	Arterial Commercial	GENERIC RESTAURANT/NIGHT CLUB/TAVERN	70	No Existing Units	7.33		
2301110800	87472	BQ	1.23	East Valley Specific Plan	Mixed Use	C-G	80	0.29	0	13	9		4	Arterial Commercial	SINGLE TENANT STAND ALONE RETAIL BLDG	75	No Existing Units	1.04		
2301111000	87474	BQ	1.23	East Valley Specific Plan	Mixed Use	C-G	80	0.63	0	28	19		9	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	84	No Existing Units	0.62		
2301120600	87499	BR	1.63	East Valley Specific Plan	Mixed Use	C-G	80	0.17	0	7	5		2	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	53	No Existing Units	>1; \$0 Assessed Improvement Value		
2301120700	120003	BR	1.63	East Valley Specific Plan	Mixed Use	C-G	80	0.14	0	6	4		2	Arterial Commercial	SINGLE TENANT STAND ALONE RETAIL BLDG	75	No Existing Units	4.14		
2301121400	705089	BR	1.63	East Valley Specific Plan	Mixed Use	C-G	80	0.12	0	5	3		2	Arterial Commercial	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2301121500	705093	BR	1.63	East Valley Specific Plan	Mixed Use	C-G	80	0.13	0	6	4		2	Arterial Commercial	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2301121700	705088	BR	1.63	East Valley Specific Plan	Mixed Use	C-G	80	0.13	0	6	4		2	Arterial Commercial	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2301121800	705081	BR	1.63	East Valley Specific Plan	Mixed Use	C-G	80	0.12	0	5	3		2	Arterial Commercial	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		

Assessor Parcel Number	Parcel ID	Consolidated Site ID	Consolidated Area (Acres)	Specific Planning Area	General Plan	Zoning	Density	Site Area (Acres)	Existing Dwelling Units	Total New RHNA Units	New Lower Income Units	New Moderate Income Units	New Above Moderate Units	SANDAG Land Use	Assessor Land Use	Year Built	New Units / Existing Units Ratio	Land to Improvement Ratio	Fourth Cycle Site	Fifth Cycle Site
2301121900	705045	BR	1.63	East Valley Specific Plan	Mixed Use	C-G	80	0.24	0	11	8		3	Arterial Commercial	GENERIC RESTAURANT/NIGHT CLUB/TAVERN	Unknown	No Existing Units	3.50		
2301122000	87500	BR	1.63	East Valley Specific Plan	Mixed Use	C-G	80	0.59	0	26	18		8	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	79	No Existing Units	1.18		
2301210300	87487	BS	0.90	East Valley Specific Plan	Mixed Use	C-G	80	0.18	0	8	6		2	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	58	No Existing Units	3.46		
2301210500	87488	BS	0.90	East Valley Specific Plan	Mixed Use	C-G	80	0.19	0	8	6		2	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	Unknown	No Existing Units	1.06		
2301210600	88522	BS	0.90	East Valley Specific Plan	Mixed Use	C-G	80	0.17	0	8	6		2	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	Unknown	No Existing Units	1.37		
2301210700	120005	BT	0.67	East Valley Specific Plan	Mixed Use	C-G	80	0.15	0	7	5		2	Other Retail Trade and Strip Commercial	GENERIC MEDICAL/DENTAL OFFICE	75	No Existing Units	3.45		
2331501500	183553			Downtown SPA	SPA 9	S-P	100	0.22	0	10	7		3	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	Unknown	No Existing Units	0.22		
2301210800	345303	BT	0.67	East Valley Specific Plan	Mixed Use	C-G	80	0.16	1	6	4		2	Single Family Detached	SINGLE FAMILY RESIDENCE	59	6	2.00		
2301210900	345304	BT	0.67	East Valley Specific Plan	Mixed Use	C-G	80	0.18	0	8	6		2	Other Retail Trade and Strip Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	81	No Existing Units	1.33		
2301211000	345305	BT	0.67	East Valley Specific Plan	Mixed Use	C-G	80	0.18	1	7	5		2	Single Family Detached	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	85	7	0.51		
2301211600	87489		-	East Valley Specific Plan	Mixed Use	C-G	80	0.18	0	8		8	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	76	No Existing Units	1.27		
2301211700	87490	BS	0.90	East Valley Specific Plan	Mixed Use	C-G	80	0.19	0	8	6		2	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	81	No Existing Units	0.70		
2301211800	704978	BS	0.90	East Valley Specific Plan	Mixed Use	C-G	80	0.18	0	8	6		2	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	80	No Existing Units	0.60		
2301220800	704958	BV	0.43	East Valley Specific Plan	Mixed Use	C-G	80	0.31	0	14		14	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	68	No Existing Units	0.57		

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2301221000	345323	BU	0.43	East Valley Specific Plan	Mixed Use	C-G	80	0.22	0	10		10	FALSE	Office (Low-Rise)	MEDICAL-DENTAL OFFICE	65	No Existing Units	2.00		
2301221100	345324	BU	0.43	East Valley Specific Plan	Mixed Use	C-G	80	0.22	1	9		9	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	58	9	>1; \$0 Assessed Improvement Value		
2301221300	345326		-	East Valley Specific Plan	Mixed Use	C-G	80	0.21	1	8		8	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	25	8	1.76		
2301221500	73554	BV	0.43	East Valley Specific Plan	Mixed Use	C-G	80	0.12	0	6		6	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2301311900	119997	BG	1.42	East Valley Specific Plan	Mixed Use	C-G	80	0.14	1	6	4		2	Single Family Detached	SINGLE FAMILY RESIDENCE	59	6	2.75		
2301312000	119998	BG	1.42	East Valley Specific Plan	Mixed Use	C-G	80	0.15	1	6	4		2	Single Family Detached	SINGLE FAMILY RESIDENCE	59	6	1.36		
2301312600	87501	BF	0.70	East Valley Specific Plan	Mixed Use	C-G	80	0.45	0	20	14		6	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	65	No Existing Units	1.30		
2301312800	158712	BF	0.70	East Valley Specific Plan	Mixed Use	C-G	80	0.24	0	11	8		3	Arterial Commercial	2 - 4 UNITS - GENERIC	60	No Existing Units	>1; \$0 Assessed Improvement Value		
2301313000	119999	BG	1.42	East Valley Specific Plan	Mixed Use	C-G	80	0.20	1	8	6		2	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	59	8	2.40		
2301313100	87503	BG	1.42	East Valley Specific Plan	Mixed Use	C-G	80	0.28	0	12	8		4	Arterial Commercial	FAST FOOD RESTAURANT	Unknown	No Existing Units	4.67		
2301313800	151292	BA	0.46		U3	R-3-18	18	0.23	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	58	2	2.22		
2301314000	151293	BA	0.46		U3	R-3-18	18	0.23	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	59	2	1.25	Yes	
2301314200	87504	BG	1.42	East Valley Specific Plan	Mixed Use	C-G	80	0.32	0	14	10		4	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	89	No Existing Units	0.33		
2301314400	87505	BG	1.42	East Valley Specific Plan	Mixed Use	C-G	80	0.33	0	15	10		5	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2301321300	87491	BH	2.07	East Valley Specific Plan	Mixed Use	C-G	80	0.16	0	7	5		2	Arterial Commercial	GENERIC RESTAURANT/NIGHT CLUB/TAVERN	55	No Existing Units	4.05		
2301321400	87492	BH	2.07	East Valley Specific Plan	Mixed Use	C-G	80	0.12	0	6	4		2	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	74	No Existing Units	2.00		

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2301321500	87493	BH	2.07	East Valley Specific Plan	Mixed Use	C-G	80	0.12	0	6	4		2	Arterial Commercial	OFFICE/RETAIL BUILDING	72	No Existing Units	1.62		
2301321600	87494	BH	2.07	East Valley Specific Plan	Mixed Use	C-G	80	0.25	0	11	8		3	Arterial Commercial	GENERIC OFFICE/RETAIL 1-3 STORIES	73	No Existing Units	1.24		
2301324200	704809		-		U3	R-3-18	18	0.19	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	60	2	1.18	Yes	
2301325700	88518	BH	2.07	East Valley Specific Plan	Mixed Use	C-G	80	0.97	0	43	30		13	Arterial Commercial	AUTOMOTIVE REPAIR GARAGES	88	No Existing Units	1.77		
2301325800	704950	BH	2.07	East Valley Specific Plan	Mixed Use	C-G	80	0.33	0	15	10		5	Arterial Commercial	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2301325900	5261738	BH	2.07	East Valley Specific Plan	Mixed Use	C-G	80	0.12	0	6	4		2	Arterial Commercial	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2301333100	73558	BI	0.71	East Valley Specific Plan	Mixed Use	C-G	80	0.37	0	17	12		5	Parking Lot - Surface	PARKING LOT MINIMAL IMPROVEMENTS	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2301333300	73559	BI	0.71	East Valley Specific Plan	Mixed Use	C-G	80	0.34	0	15	10		5	Arterial Commercial	AUTOMOTIVE REPAIR GARAGES	77	No Existing Units	1.52		
2301333900	151115		-	East Valley Specific Plan	Urban Residential IV/V	C-G	30	5.01	0	125	86		39	Neighborhood Shopping Center	COMMUNITY SHOPPING CENTER	79	No Existing Units	0.78		
2301410200	5394680	BJ	6.14	East Valley Specific Plan	Mixed Use	C-G	80	5.20	0	234	161		73	Neighborhood Shopping Center	GROCERY/DRUG LARGE CHAIN GENERIC	87	No Existing Units	0.92		
2301410400	5394674	BJ	6.14	East Valley Specific Plan	Mixed Use	C-G	80	0.72	0	32	22		10	Neighborhood Shopping Center	CAR WASH	74	No Existing Units	7.50		
2301410500	5394668	BJ	6.14	East Valley Specific Plan	Mixed Use	C-G	80	0.22	0	10	7		3	Neighborhood Shopping Center	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	75	No Existing Units	1.14		
2301410800	5394678		-	East Valley Specific Plan	Mixed Use	C-G	80	0.55	0	25	17		8	Neighborhood Shopping Center	GENERIC - RADIO STATION/BANK/MISC	78	No Existing Units	0.81		
2301610300	345297	CP	0.33	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.16	0	4		4	FALSE	Other Retail Trade and Strip Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	74	No Existing Units	1.48		
2301610400	345298	CP	0.33	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.17	1	3		3	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	80	3	1.54		
2301610600	345300	CO	0.31	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.15	1	3		3	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	35	3	1.57		

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2301610700	345301	CO	0.31	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.16	1	3		3	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	56	3	7.33		
2301620100	180142	DC	1.98	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.16	0	4	3		1	Other Health Care	GENERIC MEDICAL/DENTAL OFFICE	65	No Existing Units	5.00		
2301621000	213483	DC	1.98	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.16	0	4	3		1	Parking Lot - Surface	PARKING LOT MINIMAL IMPROVEMENTS	Unknown	No Existing Units	18.43		
2301621100	213484	DC	1.98	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.16	0	4	3		1	Other Health Care	GENERIC MEDICAL/DENTAL OFFICE	87	No Existing Units	0.17		
2301621300	705565	DD	0.46	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.16	0	4		4	FALSE	Parking Lot - Surface	PARKING LOT MINIMAL IMPROVEMENTS	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2301621400	213486	DD	0.46	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.15	0	4		4	FALSE	Other Health Care	MEDICAL-DENTAL OFFICE	76	No Existing Units	0.21		
2301621500	705558	DD	0.46	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.15	0	4		4	FALSE	Other Health Care	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2301621600	213487	DC	1.98	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.57	0	14	10		4	Other Health Care	GENERIC MEDICAL/DENTAL OFFICE	73	No Existing Units	0.61		
2301621701	705509	DC	1.98	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.49	0	12	8		4	Other Health Care	OFFICE CONDOS	85	No Existing Units	1.47		
2301640100	345282		-	Downtown SPA	Urban Residential SPA 9	S-P	100	0.49	0	23		23	FALSE	Other Health Care	GENERIC MEDICAL/DENTAL OFFICE	70	No Existing Units	0.72		
2301710600	345318	CQ	0.97	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.17	1	3	2		1	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	47	3	>1; \$0 Assessed Improvement Value		
2301710900	327174		-	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.48	0	12		12	FALSE	Other Health Care	GENERIC MEDICAL/DENTAL OFFICE	73	No Existing Units	1.00		
2301711200	327177		-	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.16	0	4		4	FALSE	Vacant and Undeveloped Land	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2301711500	345321	CQ	0.97	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.81	0	20	14		6	Other Health Care	GENERIC MEDICAL/DENTAL OFFICE	69	No Existing Units	0.48		
2301720600	345314	CR	0.34	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.16	1	3		3	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	57	3	3.29		
2301720700	345315	CR	0.34	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.17	1	3		3	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	55	3	14.06		

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2301721000	327196	CS	0.98	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.16	1	3	2		1	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	45	3	43.66		
2301721900	345316		-	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.66	0	16	11		5	Other Health Care	MEDICAL-DENTAL OFFICE	74	No Existing Units	1.33		
2301722100	158715	CS	0.98	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.82	0	20	14		6	Other Health Care	MEDICAL/DENTAL OFFICE	78	No Existing Units	0.73		
2301810100	180141	DB	0.33	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.17	0	4		4	FALSE	Other Health Care	MEDICAL/DENTAL OFFICE	80	No Existing Units	1.03		
2301810200	327179	DB	0.33	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.16	1	3		3	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	56	3	10.01		
2301810500	705486	DA	0.66	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.18	1	3	2		1	Single Family Detached	SINGLE FAMILY RESIDENCE	Unknown	3	3.30		
2301810600	327182	DA	0.66	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.17	1	3	2		1	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	56	3	2.54		
2301810900	180143	DE	1.25	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.08	1	1	1		0	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	47	1	2.96		
2301811000	213538	DE	1.25	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.08	0	2	1		1	Other Health Care	MEDICAL-DENTAL OFFICE	71	No Existing Units	0.54		
2301811100	213539	DE	1.25	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.14	0	4	3		1	Other Health Care	MEDICAL-DENTAL OFFICE	88	No Existing Units	1.47		
2301811200	213540	DE	1.25	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.32	0	8	6		2	Other Health Care	GENERIC OFFICE/RETAIL 1-3 STORIES	69	No Existing Units	1.89		
2301811300	213541	DE	1.25	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.17	0	4	3		1	Other Health Care	MEDICAL/DENTAL OFFICE	79	No Existing Units	1.92		
2301811400	213542	DE	1.25	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.16	1	3	2		1	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	24	3	2.21		
2301811500	213543	DE	1.25	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.15	0	4	3		1	Other Health Care	GENERIC MEDICAL/DENTAL OFFICE	89	No Existing Units	0.29		
2301811600	705506	DE	1.25	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.15	0	4	3		1	Other Health Care	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2301811700	158705	DA	0.66	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.31	0	8	6		2	Other Health Care	MEDICAL/DENTAL OFFICE	75	No Existing Units	1.47		
2301820400	327199	CZ	1.58	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.16	1	3	2		1	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	56	3	2.25		

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2301820900	213526	CZ	1.58	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.14	1	2	1		1	Single Family Detached	1 - 3 STORY OFFICE ONLY	19	2	6.90		
2301821000	213527	CZ	1.58	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.16	1	3	2		1	Single Family Detached	SINGLE FAMILY RESIDENCE	51	3	1.44		
2301821100	213528	CZ	1.58	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.16	1	3	2		1	Single Family Detached	SINGLE FAMILY RESIDENCE	14	3	6.25		
2301821200	213529	CZ	1.58	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.16	1	3	2		1	Single Family Detached	SINGLE FAMILY RESIDENCE	46	3	3.60		
2301822100	327202		-	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.12	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	58	2	1.92		
2301822400	327203	CZ	1.58	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.16	0	4	3		1	Other Health Care	MEDICAL-DENTAL OFFICE	67	No Existing Units	1.62		
2301822600	213530	CZ	1.58	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.64	0	16	11		5	Other Health Care	MEDICAL/DENTAL OFFICE	80	No Existing Units	0.34		
2301910600	345313	CU	0.32	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.16	0	4		4	FALSE	Parking Lot - Surface	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1 ; \$0 Assessed Improvement Value		
2301910800	88521	CU	0.32	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.16	1	3		3	FALSE	Single Family Detached	VACANT LAND COMMERCIAL	Unknown	3	>1 ; \$0 Assessed Improvement Value		
2301911000	327219	CV	0.64	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.16	1	3	2		1	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	59	3	5.56		
2301911100	327220	CV	0.64	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.15	1	3	2		1	Single Family Detached	SINGLE FAMILY RESIDENCE	56	3	2.00		
2301911200	327221	CV	0.64	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.16	1	3	2		1	Single Family Detached	SINGLE FAMILY RESIDENCE	57	3	2.75		
2301911300	705132	CV	0.64	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.16	1	3	2		1	Single Family Detached	SINGLE FAMILY RESIDENCE	58	3	1.39		
2301911500	327223	CT	0.32	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.15	0	4		4	FALSE	Office (Low-Rise)	GENERIC MEDICAL/DENTAL OFFICE	62	No Existing Units	2.25		
2301911700	119962	CT	0.32	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.08	1	1		1	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	58	1	3.33		
2301911800	327224	CT	0.32	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.08	1	1		1	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	58	1	1.78		
2301920100	345327		-	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.17	0	4		4	FALSE	Office (Low-Rise)	GENERIC MEDICAL/DENTAL OFFICE	89	No Existing Units	1.06		

Assessor Parcel Number	Parcel ID	Consolidated Site ID	Consolidated Area (Acres)	Specific Planning Area	General Plan	Zoning	Density	Site Area (Acres)	Existing Dwelling Units	Total New RHNA Units	New Lower Income Units	New Moderate Income Units	New Above Moderate Units	SANDAG Land Use	Assessor Land Use	Year Built	New Units / Existing Units Ratio	Land to Improvement Ratio	Fourth Cycle Site	Fifth Cycle Site
2301920300	345329	BZ	0.94	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.16	0	4	3		1	Office (Low-Rise)	GENERIC MEDICAL/DENTAL OFFICE	70	No Existing Units	3.33		
2301920400	345330	BZ	0.94	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.16	1	3	2		1	Single Family Detached	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	Unknown	3	2.50		
2301920500	73555	BZ	0.94	East Valley Specific Plan	Urban Residential IV/V	C-P	30	0.33	0	8	6		2	Office (Low-Rise)	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	80	No Existing Units	0.59		
2301920600	705030	BZ	0.94	East Valley Specific Plan	Urban Residential IV/V	C-P	30	0.17	0	4	3		1	Office (Low-Rise)	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2301920900	327204		-	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.16	1	3		3	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	58	3	3.33		
2301921100	327206		-	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.16	1	3		3	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	58	3	6.90		
2301921400	327209		-	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.16	1	3		3	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	55	3	3.33		
2301921900	705026	BZ	0.94	East Valley Specific Plan	Urban Residential IV/V	C-P	30	0.11	0	3	2		1	Office (Low-Rise)	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2302010100	705221		-	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.16	0	4		4	FALSE	Parking Lot - Surface	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2302010500	327226		-	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.17	1	3		3	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	75	3	1.98		
2302011200	213473	CW	0.62	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.16	1	3	2		1	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	54	3	2.60		
2302011600	213475		-	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.15	1	3		3	FALSE	Single Family Detached	GENERIC MEDICAL/DENTAL OFFICE	84	3	1.37		
2302011900	705454	CW	0.62	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.47	0	12	8		4	Other Public Services	MISC INST	86	No Existing Units	0.53		
2302020300	327212		-	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.17	1	3		3	FALSE	Single Family Detached	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	54	3	1.60		
2302100500	704998		-	East Valley Specific Plan	Mixed Use	H-P	80	0.23	0	11		11	FALSE	Vacant and Undeveloped Land	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		

Assessor Parcel Number	Parcel ID	Consolidated Site ID	Consolidated Area (Acres)	Specific Planning Area	General Plan	Zoning	Density	Site Area (Acres)	Existing Dwelling Units	Total New RHNA Units	New Lower Income Units	New Moderate Income Units	New Above Moderate Units	SANDAG Land Use	Assessor Land Use	Year Built	New Units / Existing Units Ratio	Land to Improvement Ratio	Fourth Cycle Site	Fifth Cycle Site
2302100800	704964	BX	0.61	East Valley Specific Plan	Mixed Use	H-P	80	0.28	0	12	8		4	Vacant and Undeveloped Land	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2302100900	704961	BX	0.61	East Valley Specific Plan	Mixed Use	H-P	80	0.33	0	15	10		5	Vacant and Undeveloped Land	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2302102100	705032	BY	0.98	East Valley Specific Plan	Mixed Use	H-P	80	0.29	0	13	9		4	Parking Lot - Surface	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2302102300	345295		-	East Valley Specific Plan	Mixed Use	H-P	80	0.69	0	31	21		10	Other Health Care	GENERIC MEDICAL/DENTAL OFFICE	62	No Existing Units	0.70		
2302102600	705036	BY	0.98	East Valley Specific Plan	Mixed Use	C-P	80	0.69	0	31	21		10	Other Health Care	1 - 3 STORY OFFICE ONLY	75	No Existing Units	1.39		
2302303900	5050686	BW	8.17	East Valley Specific Plan	Mixed Use	C-G	80	4.06	0	183	126		57	Community Shopping Center	COMMUNITY SHOPPING CENTER	93	No Existing Units	9.00		
2302304500	5282755	BW	8.17	East Valley Specific Plan	Mixed Use	C-G	80	3.99	0	180	124		56	Community Shopping Center	GROCERY STORE INDEPENDENT	93	No Existing Units	1.18		
2302304700	5282757	BW	8.17	East Valley Specific Plan	Mixed Use	C-G	80	0.11	0	5	3		2	Community Shopping Center	GROCERY STORE INDEPENDENT	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2302510100	215348		-	East Valley Specific Plan	Residential IV/V	H-P	30	0.17	0	4		4	FALSE	Other Health Care	GENERIC MEDICAL/DENTAL OFFICE	65	No Existing Units	1.75		
2302510300	213520	DJ	0.99	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.16	0	4	3		1	Parking Lot - Surface	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2302510700	213521	DJ	0.99	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.21	0	5	3		2	Other Health Care	GENERIC MEDICAL/DENTAL OFFICE	72	No Existing Units	1.48		
2302510800	193259	DJ	0.99	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.15	0	4	3		1	Other Health Care	MEDICAL-DENTAL OFFICE	52	No Existing Units	1.67		
2302511100	23237	DK	0.52	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.17	1	3	2		1	Single Family Detached	SINGLE FAMILY RESIDENCE	14	3	2.45		
2302511400	215349	DK	0.52	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.17	0	4	3		1	Other Health Care	GENERIC MEDICAL/DENTAL OFFICE	54	No Existing Units	2.19		
2302511500	215350	DK	0.52	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.18	0	4	3		1	Other Health Care	GENERIC MEDICAL/DENTAL OFFICE	52	No Existing Units	10.00		
2302511600	213522	DJ	0.99	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.47	0	12	8		4	Other Health Care	GENERIC MEDICAL/DENTAL OFFICE	69	No Existing Units	0.65		

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2302511800	705710		-	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.42	0	10		10	FALSE	Parking Lot - Surface	VACANT LAND COMMERCIAL	Unknown	No Existing Units	10.00		
2302520200	213489	DI	0.32	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.16	0	4		4	FALSE	Other Health Care	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2302520300	213490	DI	0.32	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.16	0	4		4	FALSE	Parking Lot - Surface	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2302520700	213492	DH	0.93	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.15	0	4	3		1	Other Health Care	2 - 4 UNITS - GENERIC	Unknown	No Existing Units	1.33		
2302521200	23223	DH	0.93	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.18	1	3	2		1	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	53	3	11.34	Yes	
2302521500	193261		-	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.24	0	6		6	FALSE	Office (Low-Rise)	GENERIC MEDICAL/DENTAL OFFICE	77	No Existing Units	1.25		
2302521800	213493	DH	0.93	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.15	0	4	3		1	Other Health Care	GENERIC OFFICE/RETAIL 1-3 STORIES	64	No Existing Units	0.32		
2302522000	705621	DH	0.93	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.45	0	11	8		3	Other Health Care	PUBLIC BUILDING - SCHOOL, FIREHOUSE, LIBRARY, ETC	64	No Existing Units	0.20		
2302910300	213545	DG	1.12	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.16	0	4	3		1	Office (Low-Rise)	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2302910400	213546	DG	1.12	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.16	0	4	3		1	Office (Low-Rise)	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2302910800	213547	DG	1.12	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.16	0	4	3		1	Other Health Care	MEDICAL-DENTAL OFFICE	Unknown	No Existing Units	3.15		
2302910900	213548	DG	1.12	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.15	0	4	3		1	Other Health Care	GENERIC MEDICAL/DENTAL OFFICE	75	No Existing Units	1.33		
2302911800	705587	DG	1.12	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.24	0	6	4		2	Office (Low-Rise)	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2302911900	705583	DG	1.12	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.26	0	6	4		2	Office (Low-Rise)	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		

Assessor Parcel Number	Parcel ID	Consolidated Site ID	Consolidated Area (Acres)	Specific Planning Area	General Plan	Zoning	Density	Site Area (Acres)	Existing Dwelling Units	Total New RHNA Units	New Lower Income Units	New Moderate Income Units	New Above Moderate Units	SANDAG Land Use	Assessor Land Use	Year Built	New Units / Existing Units Ratio	Land to Improvement Ratio	Fourth Cycle Site	Fifth Cycle Site
2302920100	705557	DF	0.33	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.16	0	4		4	FALSE	Parking Lot - Surface	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2302920200	213531	DF	0.33	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.17	0	4		4	FALSE	Other Health Care	GENERIC MEDICAL/DENTAL OFFICE	80	No Existing Units	0.27		
2302920700	213536	CY	0.31	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.12	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	47	2	4.33		
2302920800	213537	CY	0.31	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.20	0	5		5	FALSE	Office (Low-Rise)	MEDICAL-DENTAL OFFICE	77	No Existing Units	0.75		
2303310300	213478	CX	0.82	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.17	0	4	3		1	Office (Low-Rise)	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	90	No Existing Units	1.48		
2303310400	213479	CX	0.82	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.17	0	4	3		1	Office (Low-Rise)	GENERIC MEDICAL/DENTAL OFFICE	73	No Existing Units	1.00		
2303310500	213480	CX	0.82	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.17	0	4	3		1	Office (Low-Rise)	GENERIC MEDICAL/DENTAL OFFICE	74	No Existing Units	0.55		
2303311700	5051886	CX	0.82	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.32	0	8	6		2	Office (Low-Rise)	GENERIC MEDICAL/DENTAL OFFICE	90	No Existing Units	1.18		
2303320400	213560		-	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.16	1	3		3	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	34	3	3.16		
2303802200	213589		-		U3	R-3-18	18	0.79	1	10		10	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	15	10	6.26	Yes	
2305104400	705947		-		S	R-1-10	4.356	0.85	0	3			3	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	
2305202800	705990		-		E2	RE-20	2.178	3.06	0	3			3	Single Family Multiple-Units	2 - 4 UNITS - GENERIC	47	No Existing Units	1.14	Yes	Yes
2310213700	151097		-		U1	R-1-6	7.26	0.48	1	2			2	Single Family Detached	SINGLE FAMILY RESIDENCE	55	2	1.84	Yes	
2310222200	130125	V	0.99		U2	R-2-12	12	0.33	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	30	2	1.00	Yes	Yes
2310222400	130127	V	0.99		U2	R-2-12	12	0.66	1	5		5	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	57	5	6.54	Yes	Yes
2310225500	130128		-		U2	R-2-12	12	0.45	1	3		3	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	60	3	2.81		
2310401300	87706	U	5.22		U2	R-2-12	12	3.75	0	33		33	FALSE	Other Retail Trade and Strip Commercial	SINGLE FAMILY RESIDENCE - GENERIC	40	No Existing Units	11.21	Yes	
2310401500	87707	U	5.22		U2	R-2-12	12	0.43	1	3		3	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	42	3	1.81	Yes	

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2310401600	703839	U	5.22		U2	R-2-12	12	1.04	0	9		9	FALSE	Other Retail Trade and Strip Commercial	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	
2310401700	516090	T	1.22		U2	R-2-10	10	0.48	1	3			3	Single Family Detached	SINGLE FAMILY RESIDENCE	5	3	1.15	Yes	
2310401800	516091	T	1.22		U2	R-2-10	10	0.34	1	2			2	Single Family Detached	SINGLE FAMILY RESIDENCE	57	2	3.77	Yes	
2310401900	516092	T	1.22		U2	R-2-10	10	0.39	1	2			2	Single Family Detached	SINGLE FAMILY RESIDENCE	57	2	5.33	Yes	
2310502800	151414	S	1.46		U1	R-1-6	7.26	0.68	1	3			3	Single Family Detached	SINGLE FAMILY RESIDENCE	50	3	1.06		
2310502900	151415	S	1.46		U1	R-1-6	7.26	0.78	1	3			3	Single Family Detached	SINGLE FAMILY RESIDENCE	50	3	1.54		
2310703600	299622		-		U1	R-1-6	7.26	1.33	1	6			6	Single Family Detached	SINGLE FAMILY RESIDENCE	65	6	1.88	Yes	
2310703900	704934		-		U3	R-3-18	18	0.27	1	3		3	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	58	3	1.82	Yes	
2310710600	704629		-		U1	R-1-6	7.26	1.20	1	6			6	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	49	6	8.09	Yes	
2311005800	159175		-		S	R-1-10	4.356	0.85	1	2			2	Single Family Detached	SINGLE FAMILY RESIDENCE	13	2	4.00	Yes	
2311006500	87397		-		S	R-1-10	4.356	0.89	1	2			2	Single Family Detached	SINGLE FAMILY RESIDENCE	57	2	1.43	Yes	
2311007900	5246933		-		S	R-1-10	4.356	1.34	1	3			3	Spaced Rural Residential	SINGLE FAMILY RESIDENCE	64	3	4.54	Yes	
2311011600	159221		-		S	R-1-10	4.356	0.79	1	2			2	Single Family Detached	SINGLE FAMILY RESIDENCE	48	2	1.22	Yes	
2311200100	87742		-		U2	R-1-6	7.26	0.65	1	3			3	Spaced Rural Residential	SINGLE FAMILY RESIDENCE	59	3	4.01		
2311321200	109956		-		S	R-1-10	4.356	0.90	1	2			2	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	52	2	1.04	Yes	
2311402000	703825		-		S	RE-20	2.178	4.21	1	6			6	Spaced Rural Residential	SINGLE FAMILY RESIDENCE - GENERIC	45	6	1.22	Yes	Yes
2312021500	705523		-		E2	RE-20	2.178	4.79	1	7			7	Spaced Rural Residential	SINGLE FAMILY RESIDENCE - GENERIC	13	7	1.74	Yes	Yes
2313310700	151334		-		U3	R-2-12	12	0.37	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	49	2	2.46	Yes	
2313311600	151350	W	2.54		U3	R-3-18	18	0.34	0	4		4	FALSE	Arterial Commercial	PRESCHOOL AND CHILDCARE FACILITY	69	No Existing Units	5.24		
2313311700	151351	W	2.54		U3	R-3-18	18	2.20	0	6		6	FALSE	Multi-Family Residential Without Units	16 - 60 UNITS GENERIC	65	No Existing Units	1.00		
2313502600	159170	GR	3.84		S	R-1-10	4.356	1.67	1	4			4	Single Family Detached	SINGLE FAMILY RESIDENCE	59	4	3.21	Yes	Yes

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2313504300	1565063	GR	3.84		S	R-1-10	4.356	2.17	0	7			7	Religious Facility	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2313601900	567239		-		S	RE-20	2.178	2.29	1	3			3	Single Family Detached	SINGLE FAMILY RESIDENCE	65	3	3.59	Yes	Yes
2314503200	159148		-		E2	RE-20	2.178	2.38	1	3			3	Spaced Rural Residential	MILLS ACT (OTHER THAN SINGL FAM OWNER OCCUPIED)	36	3	1.50	Yes	
2314700200	109834		-		S	R-1-10	4.356	1.01	1	2			2	Single Family Detached	SINGLE FAMILY RESIDENCE	59	2	1.94	Yes	Yes
2314700600	109815	GS	4.26		S	R-1-10	4.356	2.56	1	7			7	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	56	7	1.00	Yes	
2314701700	109931		-		S	R-1-10	4.356	0.90	1	2			2	Single Family Detached	SINGLE FAMILY RESIDENCE	54	2	1.74	Yes	
2314702800	704166	GS	4.26		S	R-1-10	4.356	1.70	1	5			5	Single Family Detached	SINGLE FAMILY RESIDENCE	79	5	1.57	Yes	Yes
2314704100	109820		-		S	R-1-10	4.356	1.26	1	3			3	Single Family Detached	SINGLE FAMILY RESIDENCE	59	3	1.53	Yes	
2320913500	5043968	AP	8.69	Downtown SPA	SPA 9	FCC	100	0.69	0	34	23		11	Rail Station/Transit Center		Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		Yes
2321000800	355755	AP	8.69	Downtown SPA	SPA 9	S-P	100	2.97	0	148	102		46	Rail Station/Transit Center		Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		Yes
2321001100	706225	AP	8.69	Downtown SPA	SPA 9	S-P	100	3.10	0	155	107		48	Rail Station/Transit Center		Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		Yes
2321001900	706237	AP	8.69	Downtown SPA	SPA 9	S-P	100	1.93	0	97	67		30	Rail Station/Transit Center		Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		Yes
2321002000	124873	AQ	2.68	Downtown SPA	SPA 9	S-P	100	1.21	0	60	41		19	Office (Low-Rise)	GENERIC- RADIO STATION/BANK/M ISC	84	No Existing Units	0.22		
2321002100	213778	AQ	2.68	Downtown SPA	SPA 9	S-P	100	1.47	0	73	50		23	Office (Low-Rise)	GENERIC- RADIO STATION/BANK/M ISC	Unknown	No Existing Units	133.15		
2321100600	213742		-		U3	R-3-18	18	0.29	1	3		3	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	Unknown	3	1.62	Yes	
2321101700	706401		-	Downtown SPA	SPA 9	S-P	100	1.07	0	52	36		16	Industrial Park	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	79	No Existing Units	1.52		Yes
2321701200	213801		-		S	R-1-10	4.356	1.92	1	5			5	Spaced Rural Residential	SINGLE FAMILY RESIDENCE	22	5	4.00	Yes	Yes

Assessor Parcel Number	Parcel ID	Consolidated Site ID	Consolidated Area (Acres)	Specific Planning Area	General Plan	Zoning	Density	Site Area (Acres)	Existing Dwelling Units	Total New RHNA Units	New Lower Income Units	New Moderate Income Units	New Above Moderate Units	SANDAG Land Use	Assessor Land Use	Year Built	New Units / Existing Units Ratio	Land to Improvement Ratio	Fourth Cycle Site	Fifth Cycle Site
2322702700	732651		-		U1	R-1-6	7.26	0.78	1	3			3	Single Family Detached	SINGLE FAMILY RESIDENCE	50	3	2.00		
2323202900	387922		-		U2	R-2-12	12	0.29	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	54	2	1.80	Yes	
2323402000	32715		-		U1	R-1-7	6.22	0.54	1	2			2	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	10	2	2.25	Yes	
2323403500	406395		-		U1	R-1-7	6.22	2.10	1	9			9	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	69	9	0.32	Yes	
2325121000	618417		-		E2	RE-20	2.178	2.28	1	3			3	Spaced Rural Residential	SINGLE FAMILY RESIDENCE	79	3	2.08	Yes	
2325121300	256631	GA	10.07		E2	RE-20	2.178	5.44	1	8			8	Spaced Rural Residential	SINGLE FAMILY RESIDENCE	34	8	2.59	Yes	
2325121500	708168	GA	10.07		E2	RE-20	2.178	1.31	0	2			2	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2325121600	708165	GA	10.07		E2	RE-20	2.178	1.10	0	2			2	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2325121700	708172	GA	10.07		E2	RE-20	2.178	1.23	0	2			2	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	
2325121800	708183	GA	10.07		E2	RE-20	2.178	1.00	0	2			2	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	
2330220200	706356		-	Downtown SPA	SPA 9	S-P	100	0.17	0	8		8	FALSE	Vacant and Undeveloped Land	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2330220500	213786		-	Downtown SPA	SPA 9	S-P	100	0.17	0	8		8	FALSE	Office (Low-Rise)	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	62	No Existing Units	1.87	Yes	Yes
2330220700	213788		-	Downtown SPA	SPA 9	S-P	100	0.29	0	13		13	FALSE	Office (Low-Rise)	GENERIC RESTAURANT/NIG HT CLUB/TAVERN	60	No Existing Units	1.00	Yes	Yes
2331502100	706378	EI	2.78	Downtown SPA	SPA 9	S-P	75	0.68	0	26	18		8	Religious Facility	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	
2330521400	706307		-	Downtown SPA	SPA 9	S-P	100	1.25	0	61	42		19	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	80	No Existing Units	1.08		Yes
2330611200	288610	CC	0.32	Downtown SPA	SPA 9	S-P	75	0.10	0	4		4	FALSE	Parking Lot - Surface	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes

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2330611300	25215	CC	0.32	Downtown SPA	SPA 9	S-P	75	0.22	0	8		8	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	80	No Existing Units	0.43		Yes
2330612600	213755		-	Downtown SPA	SPA 9	S-P	75	0.71	0	25	17		8	Arterial Commercial	1 - 3 STORY OFFICE ONLY	77	No Existing Units	0.67		Yes
2330620100	213769		-	Downtown SPA	SPA 9	S-P	75	0.33	0	11		11	FALSE	Other University or College	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	83	No Existing Units	0.17		Yes
2330620400	213772	CD	0.33	Downtown SPA	SPA 9	S-P	75	0.09	0	2		2	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	60	No Existing Units	1.33	Yes	Yes
2330620500	213773	CD	0.33	Downtown SPA	SPA 9	S-P	75	0.08	0	2		2	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	52	No Existing Units	1.27		Yes
2330620600	213774	CD	0.33	Downtown SPA	SPA 9	S-P	75	0.08	0	3		3	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	Unknown	No Existing Units	3.30	Yes	Yes
2330620700	213775	CD	0.33	Downtown SPA	SPA 9	S-P	75	0.08	0	3		3	FALSE	Arterial Commercial	GENERIC RESTAURANT/NIGHT CLUB/TAVERN	Unknown	No Existing Units	2.09	Yes	Yes
2330621001	706064		-	Downtown SPA	SPA 9	S-P	75	1.26	0	46	32		14	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	54	No Existing Units	0.82		Yes
2330621100	213776		-	Downtown SPA	SPA 9	S-P	75	0.07	0	2		2	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	40	No Existing Units	1.17	Yes	Yes
2330710300	26798	EB	0.95	Downtown SPA	SPA 9	S-P	100	0.15	0	7	5		2	Arterial Commercial	VACANT LAND COMMERCIAL	Unknown	No Existing Units	15.00	Yes	Yes
2330711700	26799	EB	0.95	Downtown SPA	SPA 9	S-P	100	0.24	0	11	8		3	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	65	No Existing Units	0.54		
2330711800	26800	EB	0.95	Downtown SPA	SPA 9	S-P	100	0.24	0	11	8		3	Arterial Commercial	USED CAR LOT	83	No Existing Units	2.04	Yes	Yes
2330711900	706291	EB	0.95	Downtown SPA	SPA 9	S-P	100	0.32	0	15	10		5	Other Transportation	USED CAR LOT	Unknown	No Existing Units	>1 ; \$0 Assessed Improvement Value	Yes	Yes
2330720601	706141		-	Downtown SPA	SPA 9	S-P	75	0.31	0	11		11	FALSE	Parking Lot - Surface	PARKING LOT MINIMAL IMPROVEMENTS	Unknown	No Existing Units	20.67	Yes	Yes

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2330720800	101011	EA	0.46	Downtown SPA	SPA 9	S-P	75	0.31	0	11		11	FALSE	Office (Low-Rise)	MORTUARY	41	No Existing Units	0.50		Yes
2330720900	706195	EA	0.46	Downtown SPA	SPA 9	S-P	75	0.15	0	6		6	FALSE	Office (Low-Rise)	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2330810100	101010	CE	0.50	Downtown SPA	SPA 9	S-P	75	0.17	0	7	5		2	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	Unknown	No Existing Units	1.00	Yes	Yes
2330810200	213459	CE	0.50	Downtown SPA	SPA 9	S-P	75	0.09	0	2	1		1	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	65	No Existing Units	1.00	Yes	
2330810500	213461		-	Downtown SPA	SPA 9	S-P	75	0.08	0	2		2	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	50	No Existing Units	1.07	Yes	
2330810700	213463	CF	0.32	Downtown SPA	SPA 9	S-P	75	0.16	0	5		5	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	51	No Existing Units	0.50	Yes	
2330810800	213464	CF	0.32	Downtown SPA	SPA 9	S-P	75	0.09	0	3		3	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	65	No Existing Units	0.61	Yes	
2330810900	213465	CF	0.32	Downtown SPA	SPA 9	S-P	75	0.07	0	2		2	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	39	No Existing Units	1.25	Yes	Yes
2330811700	706030		-	Downtown SPA	SPA 9	S-P	75	0.66	0	25	17		8	Arterial Commercial		Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2330812300	213467		-	Downtown SPA	SPA 9	S-P	75	0.16	0	5		5	FALSE	Arterial Commercial	OFFICE/RETAIL BUILDING	50	No Existing Units	0.62	Yes	
2330812400	213468	CE	0.50	Downtown SPA	SPA 9	S-P	75	0.16	0	5	3		2	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	39	No Existing Units	1.00	Yes	Yes
2330812500	213469	CE	0.50	Downtown SPA	SPA 9	S-P	75	0.08	0	2	1		1	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	55	No Existing Units	1.22	Yes	Yes
2330820500	213439		-	Downtown SPA	SPA 9	S-P	75	0.08	0	2		2	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	50	No Existing Units	1.11	Yes	Yes
2330821100	213445		-	Downtown SPA	SPA 9	S-P	75	0.09	0	3		3	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	65	No Existing Units	0.93	Yes	

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2330821400	705910		-	Downtown SPA	SPA 9	S-P	75	0.08	0	3		3	FALSE	Arterial Commercial	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2330821600	705942		-	Downtown SPA	SPA 9	S-P	75	0.16	0	6		6	FALSE	Parking Lot - Surface	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2330822400	213448		-	Downtown SPA	SPA 9	S-P	75	0.25	0	8		8	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	80	No Existing Units	0.33		Yes
2330920100	23203	DS	0.49	Downtown SPA	SPA 9	S-P	75	0.17	0	5		5	FALSE	Office (Low-Rise)	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	75	No Existing Units	0.17		Yes
2330920200	706029	DS	0.49	Downtown SPA	SPA 9	S-P	75	0.16	0	6		6	FALSE	Office (Low-Rise)	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2330920300	23204	DS	0.49	Downtown SPA	SPA 9	S-P	75	0.16	0	6		6	FALSE	Parking Lot - Surface	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2330920800	255141		-	Downtown SPA	SPA 9	S-P	75	0.16	0	6		6	FALSE	Office (Low-Rise)	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	50	No Existing Units	0.61		Yes
2330920900	255142		-	Downtown SPA	SPA 9	S-P	75	0.32	0	10		10	FALSE	Office (Low-Rise)	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	59	No Existing Units	1.27	Yes	Yes
2331210200	355798		-	Downtown SPA	SPA 9	S-P	100	2.70	0	135	93		42	Industrial Park	WAREHOUSE-PROCESSING/STORAGE/DISTRIBUTION	71	No Existing Units	1.34		Yes
2331220700	28355		-	Downtown SPA	SPA 9	S-P	100	0.16	1	7		7	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	28	7	1.62	Yes	Yes
2331320600	28364		-	Downtown SPA	SPA 9	S-P	100	0.15	0	6		6	FALSE	Single Family Multiple-Units	DUPLEX - GENERIC	25	No Existing Units	1.81	Yes	Yes
2331320700	29767	EG	0.98	Downtown SPA	SPA 9	S-P	100	0.16	0	8	6		2	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	73	No Existing Units	0.73		Yes
2331320800	29768	EG	0.98	Downtown SPA	SPA 9	S-P	100	0.17	0	8	6		2	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	70	No Existing Units	1.15	Yes	Yes
2331320900	29769	EG	0.98	Downtown SPA	SPA 9	S-P	100	0.16	0	7	5		2	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	Unknown	No Existing Units	2.33	Yes	Yes

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2331321300	29770	EG	0.98	Downtown SPA	SPA 9	S-P	100	0.50	0	25	17		8	Arterial Commercial	SERVICE STATION - GENERIC	70	No Existing Units	1.95	Yes	Yes	
2331410100	26793	EC	0.33	Downtown SPA	SPA 9	S-P	100	0.17	1	7		7	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	48	7	>1; \$0 Assessed Value	4.00	Yes	Yes
2331410200	26794	EC	0.33	Downtown SPA	SPA 9	S-P	100	0.17	0	8		8	FALSE	Single Family Multiple-Units	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Value		Yes	Yes
2331410400	26801	ED	0.80	Downtown SPA	SPA 9	S-P	100	0.17	0	5	3		2	Single Family Multiple-Units	2 - 4 UNITS - GENERIC	50	No Existing Units	4.00	Yes	Yes	
2331410500	26796	ED	0.80	Downtown SPA	SPA 9	S-P	100	0.16	0	7	5		2	Arterial Commercial	GENERIC OFFICE/RETAIL 1-3 STORIES	86	No Existing Units	0.17		Yes	
2331410600	26797	ED	0.80	Downtown SPA	SPA 9	S-P	100	0.16	0	8	6		2	Arterial Commercial	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		Yes	Yes
2331410800	28344	EE	0.31	Downtown SPA	SPA 9	S-P	100	0.16	0	6		6	FALSE	Single Family Multiple-Units	2 - 4 UNITS - GENERIC	59	No Existing Units	3.52		Yes	
2331410900	28345	EE	0.31	Downtown SPA	SPA 9	S-P	100	0.15	1	7		7	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	46	7	1.63	Yes	Yes	
2331411300	28349	EF	0.45	Downtown SPA	SPA 9	S-P	100	0.16	0	6		6	FALSE	Single Family Multiple-Units	DUPLEX - GENERIC	41	No Existing Units	2.17	Yes	Yes	
2331411400	183530	EF	0.45	Downtown SPA	SPA 9	S-P	100	0.08	0	3		3	FALSE	Arterial Commercial	RESTAURANT - INDEPENDENT	9	No Existing Units	1.00	Yes	Yes	
2331411500	183531	EF	0.45	Downtown SPA	SPA 9	S-P	100	0.21	0	8		8	FALSE	Mixed Use	AUTO SALES/SERVICE AGENCY	Unknown	No Existing Units	1.60	Yes	Yes	
2331411600	183532	ED	0.80	Downtown SPA	SPA 9	S-P	100	0.31	0	15	10		5	Service Station	SERVICE STATION - GENERIC	80	No Existing Units	2.82	Yes	Yes	
2331420600	288620		-	Downtown SPA	SPA 9	S-P	75	0.18	0	6		6	FALSE	Mixed Use	COMBINATION COMMERCIAL/RESIDENTIAL BUILDING	50	No Existing Units	0.56			
2331500600	183552	EH	0.42	Downtown SPA	SPA 9	S-P	100	0.09	0	4		4	FALSE	Arterial Commercial	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		Yes	Yes
2331500900	29816	EH	0.42	Downtown SPA	SPA 9	S-P	100	0.16	0	7		7	FALSE	Arterial Commercial	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Value		Yes	Yes
2331501000	29817	EH	0.42	Downtown SPA	SPA 9	S-P	100	0.16	0	6		6	FALSE	Arterial Commercial	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		Yes	Yes

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2331502000	706404	EI	2.78	Downtown SPA	SPA 9	S-P	75	1.40	0	53	37		16	Arterial Commercial	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2331502200	706400	EI	2.78	Downtown SPA	SPA 9	S-P	100	0.70	0	34	23		11	Arterial Commercial	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2331620100	101015	DZ	0.48	Downtown SPA	SPA 9	S-P	45	0.16	0	4		4	FALSE	Office (Low-Rise)	GENERIC MEDICAL/DENTAL OFFICE	Unknown	No Existing Units	2.11		Yes
2331621200	28191	DY	0.43	Downtown SPA	SPA 9	S-P	45	0.16	1	6		6	FALSE	Single Family Detached	PRESCHOOL AND CHILDCARE FACILITY	Unknown	6	>1; \$0 Assessed Improvement Value		Yes
2331621300	28192	DY	0.43	Downtown SPA	SPA 9	S-P	45	0.16	0	3		3	FALSE	Single Family Multiple-Units	DUPLEX - GENERIC	Unknown	No Existing Units	1.14		Yes
2331621500	101017	DY	0.43	Downtown SPA	SPA 9	S-P	45	0.11	0	3		3	FALSE	Office (Low-Rise)	MEDICAL-DENTAL OFFICE	60	No Existing Units	1.00		Yes
2331622100	706199	DZ	0.48	Downtown SPA	SPA 9	S-P	45	0.33	0	11		11	FALSE	Parking Lot - Surface	CHURCH RECTORY, PRKG & OTHER CHURCH RELATED	Unknown	No Existing Units	76.77		Yes
2331720300	28193	DX	1.22	Downtown SPA	SPA 9	S-P	45	0.15	1	4	3		1	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	36	4	4.20		Yes
2331721700	706256	DX	1.22	Downtown SPA	SPA 9	S-P	45	0.75	0	24	17		7	Parking Lot - Surface	CHURCH RECTORY, PRKG & OTHER CHURCH RELATED	Unknown	No Existing Units	2.51		Yes
2331721800	101019	DX	1.22	Downtown SPA	SPA 9	S-P	45	0.32	0	10	7		3	Office (Low-Rise)	1 - 3 STORY OFFICE ONLY	84	No Existing Units	0.41		Yes
2331810200	5116683	DT	1.03	Downtown SPA	SPA 9	S-P	45	0.16	0	6	4		2	Office (Low-Rise)	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		Yes
2331810300	5116391	DT	1.03	Downtown SPA	SPA 9	S-P	45	0.20	0	6	4		2	Office (Low-Rise)	GENERIC MEDICAL/DENTAL OFFICE	Unknown	No Existing Units	5.41		Yes
2331810600	5116386	DT	1.03	Downtown SPA	SPA 9	S-P	45	0.10	1	2	1		1	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	46	2	13.55		Yes
2331810800	5116376	DT	1.03	Downtown SPA	SPA 9	S-P	45	0.11	0	3	2		1	Office (Low-Rise)	GENERIC MEDICAL/DENTAL OFFICE	83	No Existing Units	1.00		Yes
2331810900	5116373	DU	0.37	Downtown SPA	SPA 9	S-P	45	0.11	0	3		3	FALSE	Office (Low-Rise)	GENERIC MEDICAL/DENTAL OFFICE	68	No Existing Units	1.21		Yes

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2331811000	5116371	DU	0.37	Downtown SPA	SPA 9	S-P	45	0.13	0	2		2	FALSE	Single Family Multiple-Units	DUPLEX - GENERIC	41	No Existing Units	4.00		Yes
2331811200	5116368	DU	0.37	Downtown SPA	SPA 9	S-P	45	0.13	0	4		4	FALSE	Parking Lot - Surface	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		Yes
2331811800	5116366		-	Downtown SPA	SPA 9	S-P	45	0.64	0	20	14		6	Office (Low-Rise)	1 - 3 STORY OFFICE ONLY	73	No Existing Units	0.42		Yes
2331811900	5116388	DT	1.03	Downtown SPA	SPA 9	S-P	45	0.46	0	15	10		5	Office (Low-Rise)	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	74	No Existing Units	0.51		Yes
2331820300	28229	DV	0.32	Downtown SPA	SPA 9	S-P	45	0.16	0	4		4	FALSE	Office (Low-Rise)	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	Unknown	No Existing Units	1.47		Yes
2331820400	28230	DV	0.32	Downtown SPA	SPA 9	S-P	45	0.16	1	4		4	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	56	4	1.25		Yes
2331820800	29667	DW	0.40	Downtown SPA	SPA 9	S-P	45	0.16	0	4		4	FALSE	Office (Low-Rise)	GENERIC MEDICAL/DENTAL OFFICE	60	No Existing Units	4.55		Yes
2331820900	29668	DW	0.40	Downtown SPA	SPA 9	S-P	45	0.24	0	8		8	FALSE	Office (Low-Rise)	GENERIC MEDICAL/DENTAL OFFICE	60	No Existing Units	1.27		Yes
2332120600	29772		-	Downtown SPA	SPA 9	S-P	100	0.16	0	7		7	FALSE	Other Retail Trade and Strip Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	79	No Existing Units	1.06	Yes	Yes
2332121000	30558	EM	0.48	South Centre City	SPA 15	S-P	30	0.16	1	3		3	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	57	3	3.00		Yes
2332121100	30559	EM	0.48	South Centre City	SPA 15	S-P	30	0.16	1	3		3	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	52	3	2.25		Yes
2332121200	30560	EM	0.48	South Centre City	SPA 15	S-P	30	0.16	1	3		3	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	23	3	4.12		Yes
2332121300	29773	EJ	0.62	Downtown SPA	SPA 9	S-P	100	0.30	0	15	10		5	Other Retail Trade and Strip Commercial	SERVICE STATION - GENERIC	65	No Existing Units	2.18	Yes	Yes
2332121400	29774	EJ	0.62	Downtown SPA	SPA 9	S-P	100	0.32	0	16	11		5	Other Retail Trade and Strip Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	88	No Existing Units	0.40	Yes	
2332220300	30563	EN	0.32	South Centre City	SPA 15	S-P	30	0.16	1	3		3	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	24	3	2.00		Yes
2332220400	30564	EN	0.32	South Centre City	SPA 15	S-P	30	0.16	1	3		3	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	60	3	1.73		Yes

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2332220700	331531	EO	0.33	South Centre City	SPA 15	S-P	30	0.16	1	3		3	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	38	3	3.33		Yes
2332220900	31276	EO	0.33	South Centre City	SPA 15	S-P	30	0.17	0	2		2	FALSE	Single Family Multiple-Units	DUPLEX - GENERIC	26	No Existing Units	2.53	Yes	Yes
2332310200	29819	EK	1.15	Downtown SPA	SPA 9	S-P	100	0.16	1	7	5		2	Single Family Detached	SINGLE FAMILY RESIDENCE	43	7	4.11	Yes	Yes
2332310300	29820	EK	1.15	Downtown SPA	SPA 9	S-P	100	0.16	1	7	5		2	Single Family Detached	SINGLE FAMILY RESIDENCE	13	7	3.60	Yes	Yes
2332310400	29821	EK	1.15	Downtown SPA	SPA 9	S-P	100	0.17	1	8	6		2	Single Family Detached	SINGLE FAMILY RESIDENCE	58	8	5.56	Yes	Yes
2332310500	29822	EK	1.15	Downtown SPA	SPA 9	S-P	100	0.16	1	7	5		2	Single Family Detached	SINGLE FAMILY RESIDENCE	18	7	8.00	Yes	Yes
2332310600	29823	EK	1.15	Downtown SPA	SPA 9	S-P	100	0.17	1	7	5		2	Single Family Detached	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	80	7	5.18	Yes	Yes
2332310700	183546	EK	1.15	Downtown SPA	SPA 9	S-P	100	0.16	0	7	5		2	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	Unknown	No Existing Units	1.61	Yes	Yes
2332310800	183547	EK	1.15	Downtown SPA	SPA 9	S-P	100	0.16	0	7	5		2	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	57	No Existing Units	1.57	Yes	Yes
2332320100	183548	EL	0.99	Downtown SPA	SPA 9	S-P	100	0.18	0	7	5		2	Single Family Multiple-Units	DUPLEX - GENERIC	53	No Existing Units	3.43	Yes	Yes
2332320200	29824	EL	0.99	Downtown SPA	SPA 9	S-P	100	0.17	1	7	5		2	Single Family Detached	SINGLE FAMILY RESIDENCE	48	7	4.00	Yes	Yes
2332321500	30581		-	South Centre City	GC	C-G	24	0.16	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	56	2	7.01	Yes	Yes
2332321900	29827	EL	0.99	Downtown SPA	SPA 9	S-P	100	0.64	0	31	21		10	Arterial Commercial	1 - 3 STORY OFFICE ONLY	81	No Existing Units	0.52		
2332410200	30531		-	South Centre City	SPA 15	S-P	30	0.16	1	3		3	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	47	3	5.60		Yes
2332410400	30533		-	South Centre City	SPA 15	S-P	30	0.15	0	1		1	FALSE	Single Family Multiple-Units	DUPLEX - GENERIC	30	No Existing Units	6.35	Yes	Yes
2332411600	31287		-	South Centre City	SPA 15	S-P	30	0.17	1	3		3	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	42	3	2.27		Yes
2333321100	32747	EU	1.36	South Centre City	SPA 15	S-P	24	0.17	0	2		2	FALSE	Arterial Commercial	AUTOMOTIVE REPAIR GARAGES	Unknown	No Existing Units	>1 ; \$0 Assessed Improvement Value		
2333321200	32748	EU	1.36	South Centre City	SPA 15	S-P	24	0.16	0	2		2	FALSE	Arterial Commercial	GARAGE PARKING LOT/USED CAR	76	No Existing Units	1.69		

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2333321300	32749	EU	1.36	South Centre City	SPA 15	S-P	24	0.18	0	2		2	FALSE	Arterial Commercial	AUTOMOTIVE REPAIR GARAGES	79	No Existing Units	1.40		
2333321400	32750	EU	1.36	South Centre City	SPA 15	S-P	24	0.16	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	53	2	8.01		
2333321500	32751	EU	1.36	South Centre City	SPA 15	S-P	24	0.17	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	38	2	3.72		
2333322000	32752	EU	1.36	South Centre City	SPA 15	S-P	24	0.51	0	8		8	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	74	No Existing Units	2.22		
2333420400	31282	EP	0.32	South Centre City	SPA 15	S-P	30	0.17	1	3		3	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	80	3	1.77	Yes	
2333420500	31283	EP	0.32	South Centre City	SPA 15	S-P	30	0.15	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	44	2	1.47	Yes	
2333511400	32742		-	South Centre City	SPA 15	S-P	24	0.35	0	6		6	FALSE	Arterial Commercial	SERVICE STATION - GENERIC	Unknown	No Existing Units	3.37		
2333511500	32740		-	South Centre City	SPA 15	S-P	24	0.20	0	2		2	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	53	No Existing Units	2.53		
2291721300	705213	AC	0.71	Downtown SPA	SPA 9	S-P	100	0.37	0	18	12		6	Office (Low-Rise)	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	Unknown	No Existing Units	0.57		
2333521200	706725	ET	0.63	South Centre City	SPA 15	S-P	24	0.10	0	2		2	FALSE	Vacant and Undeveloped Land	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2333521400	32733	ET	0.63	South Centre City	SPA 15	S-P	24	0.16	0	2		2	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	79	No Existing Units	1.76	Yes	Yes
2333610300	706641	EQ	0.48	South Centre City	SPA 15	S-P	30	0.16	0	3		3	FALSE	Parking Lot - Surface	INSTITUTIONAL - VACANT	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2333610400	31288	EQ	0.48	South Centre City	SPA 15	S-P	30	0.32	0	3		3	FALSE	Single Family Multiple-Units	2 - 4 UNITS - GENERIC	55	No Existing Units	1.74	Yes	Yes
2333610700	32027		-	South Centre City	SPA 15	S-P	30	0.16	1	3		3	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	23	3	3.64	Yes	Yes
2333611000	32030	ER	0.32	South Centre City	SPA 15	S-P	30	0.16	1	3		3	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	26	3	2.20	Yes	Yes

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2333611100	32031	ER	0.32	South Centre City	SPA 15	S-P	30	0.16	0	2		2	FALSE	Single Family Multiple-Units	SINGLE FAMILY RESIDENCE W/GRANNY FLAT	56	No Existing Units	1.18	Yes	Yes
2333710100	331546		-	South Centre City	SPA 15	S-P	30	0.17	0	1		1	FALSE	Single Family Multiple-Units	2 - 4 UNITS - GENERIC	55	No Existing Units	1.82		Yes
2333710400	32034		-	South Centre City	SPA 15	S-P	30	0.17	1	3		3	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	48	3	1.20	Yes	Yes
2333711600	32724	ES	0.65	South Centre City	SPA 15	S-P	24	0.49	0	8		8	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	84	No Existing Units	0.56	Yes	
2333711700	32725	ES	0.65	South Centre City	SPA 15	S-P	24	0.17	0	3		3	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	87	No Existing Units	0.41	Yes	Yes
2334802300	128051	FA	4.70		S	R-1-10	4.356	3.92	1	12			12	Spaced Rural Residential	SINGLE FAMILY RESIDENCE - GENERIC	22	12	3.34	Yes	
2334802400	282843	FA	4.70		S	R-1-10	4.356	0.78	1	2			2	Single Family Detached	SINGLE FAMILY RESIDENCE W/GRANNY FLAT	72	2	1.90	Yes	
2334904200	706175		-		E2	RE-20	2.178	1.57	1	2			2	Single Family Detached	SINGLE FAMILY RESIDENCE	76	2	1.78	Yes	
2335010400	32727		-	South Centre City	SPA 15	S-P	24	0.15	0	2		2	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	55	No Existing Units	1.96	Yes	Yes
2335010600	32729		-	South Centre City	SPA 15	S-P	24	0.16	0	3		3	FALSE	Arterial Commercial	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1 ; \$0 Assessed Improvement Value	Yes	Yes
2335110900	33932		-	South Centre City	SPA 15	S-P	30	0.18	1	3		3	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	53	3	2.00	Yes	Yes
2335111100	33934		-	South Centre City	SPA 15	S-P	30	0.17	0	2		2	FALSE	Single Family Multiple-Units	2 - 4 UNITS - GENERIC	59	No Existing Units	1.35	Yes	Yes
2335946300	5292994	FH	1.15		U1	R-1-6	7.26	0.74	0	4			4	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1 ; \$0 Assessed Improvement Value		
2335946400	707110	FH	1.15		U1	R-1-6	7.26	0.41	0	2			2	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1 ; \$0 Assessed Improvement Value		
2336002200	243205		-		U2	R-2-12	12	0.60	1	4		4	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	55	4	1.52	Yes	
2336003000	255084	FI	0.59		U2	R-2-12	12	0.29	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	51	2	3.49	Yes	

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2336003200	255094	FI	0.59		U2	R-2-12	12	0.29	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	51	2	1.15	Yes	
2336112400	340692	FJ	3.60		E2	RE-20	2.178	1.49	1	1			1	Spaced Rural Residential	SINGLE FAMILY RESIDENCE	46	1	2.86	Yes	Yes
2336113700	243207	FJ	3.60		E2	RE-20	2.178	2.11	1	2			2	Spaced Rural Residential	SINGLE FAMILY RESIDENCE	94	2	1.14	Yes	Yes
2336125600	5216072	FB	0.94		S	R-1-10	4.356	0.46	0	2			2	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	
2336125900	706651	FB	0.94		S	R-1-10	4.356	0.48	0	2			2	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2336231100	127966		-		S	R-1-10	4.356	1.06	1	2			2	Single Family Detached	SINGLE FAMILY RESIDENCE	70	2	1.02	Yes	Yes
2336301900	706365		-		S	R-1-10	4.356	0.50	0	2			2	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	
2343002600	707279	FM	0.93		U2	R-2-12	12	0.47	1	3		3	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	79	3	1.52	Yes	
2343002800	707309	FM	0.93		U2	R-2-12	12	0.45	1	3		3	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	36	3	1.15	Yes	
2343900200	243206		-		U2	R-2-12	12	1.02	0	8		8	FALSE	Religious Facility	SINGLE FAMILY RESIDENCE - GENERIC	57	No Existing Units	0.78		
2350711800	707106	GB	0.93		U3	R-2-15	15	0.42	1	4		4	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	34	4	1.24		
2350712200	707081	GB	0.93		U3	R-2-15	15	0.28	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	20	2	3.85		
2350712300	707091	GB	0.93		U3	R-2-15	15	0.24	0	3		3	FALSE	Single Family Residential Without Units	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	
2350720800	732682		-		U4	R-4-24	24	0.96	1	16		16	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	40	16	2.00	Yes	Yes
2350810900	732452		-		E2	RE-40	1.089	4.73	0	4			4	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2350822900	732453		-		E2	RE-20	2.178	1.51	1	1			1	Spaced Rural Residential	SINGLE FAMILY RESIDENCE	52	1	2.63	Yes	Yes
2350900400	32679	GE	0.67		U4	R-4-24	24	0.32	1	5		5	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	47	5	0.33	Yes	
2350900500	32680	GE	0.67		U4	R-4-24	24	0.34	1	5		5	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	57	5	1.32	Yes	
2351102200	5041606		-		E2	RE-20	2.178	9.00	1	13			13	Spaced Rural Residential	AVOCADO	36	13	6.79	Yes	

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2351502100	708546		-		S	R-1-12	3.63	0.84	0	2			2	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2351902500	708378		-		E2	RE-20	2.178	2.46	0	4			4	Religious Facility	CHURCH	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2351902600	280458		-		E1	RE-40	1.089	3.29	1	2			2	Spaced Rural Residential	SINGLE FAMILY RESIDENCE - GENERIC	68	2	2.14	Yes	
2352700300	708415	GF	6.11		S	R-1-10	4.356	4.15	0	14			14	Vacant and Undeveloped Land	AVOCADO	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2352700600	708341	GF	6.11		S	R-1-10	4.356	1.97	0	6			6	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2353003400	5243762	GG	2.03		U1	R-1-7	6.22	1.09	0	3			3	Orchard or Vineyard	VINEYARD W/WINE TASTING ROOM	Unknown	No Existing Units	6.22		
2353003500	5243764	GG	2.03		U1	R-1-7	6.22	0.94	0	4			4	Orchard or Vineyard	VINEYARD W/WINE TASTING ROOM	Unknown	No Existing Units	14.00		Yes
2353501100	707282	GC	0.90		U1	R-1-6	7.26	0.50	1	2			2	Single Family Detached	SINGLE FAMILY RESIDENCE	79	2	1.82		
2353505100	732707	GD	2.87		U1	R-1-10	4.356	2.03	0	7			7	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2353505300	707337	GD	2.87		U1	R-1-10	4.356	0.84	0	3			3	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	
2353505500	732706	GC	0.90		U1	R-1-6	7.26	0.39	0	2			2	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2360320100	359647		-	South Centre City	SPA 15	S-P	24	0.16	0	3		3	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	Unknown	No Existing Units	1.01		
2360320300	32754	EV	0.32	South Centre City	SPA 15	S-P	24	0.17	0	3		3	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	72	No Existing Units	1.01		
2360320400	32755	EV	0.32	South Centre City	SPA 15	S-P	24	0.15	0	2		2	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	74	No Existing Units	1.92		
2360510100	32743		-	South Centre City	SPA 15	S-P	24	0.32	0	5		5	FALSE	Arterial Commercial	GROCERY STORE INDEPENDENT	57	No Existing Units	1.68		

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2360510400	32746	EW	0.52	South Centre City	SPA 15	S-P	24	0.16	0	2		2	FALSE	Arterial Commercial	AUTOMOTIVE REPAIR GARAGES	75	No Existing Units	2.50		
2360512000	707058	EW	0.52	South Centre City	SPA 15	S-P	24	0.35	0	5		5	FALSE	Service Station	SERVICE STATION - GENERIC	Unknown	No Existing Units	6.73		
2360520900	33545	EX	0.32	South Centre City	SPA 15	S-P	30	0.17	1	3		3	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	80	3	9.60	Yes	Yes
2360521000	33546	EX	0.32	South Centre City	SPA 15	S-P	30	0.15	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	20	2	1.50	Yes	Yes
2360521300	707054		-	South Centre City	SPA 15	S-P	30	0.15	0	3		3	FALSE	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1 ; \$0 Assessed Improvement Value	Yes	Yes
2360521400	32736		-	South Centre City	SPA 15	S-P	24	0.43	0	7		7	FALSE	Arterial Commercial	USED CAR LOT	66	No Existing Units	5.06	Yes	Yes
2360620700	331539	EY	0.93	South Centre City	SPA 15	S-P	24	0.19	0	1		1	FALSE	Single Family Multiple-Units	2 - 4 UNITS - GENERIC	39	No Existing Units	4.02	Yes	Yes
2360620800	5253437	EY	0.93	South Centre City	SPA 15	S-P	24	0.23	1	3		3	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	39	3	8.00	Yes	Yes
2360620900	34068	EY	0.93	South Centre City	SPA 15	S-P	30	0.17	0	2	1		1	Single Family Multiple-Units	DUPLEX - GENERIC	53	No Existing Units	2.13	Yes	Yes
2360621000	34069	EY	0.93	South Centre City	SPA 15	S-P	30	0.17	1	3	2		1	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	48	3	1.00	Yes	Yes
2360621100	34070	EY	0.93	South Centre City	SPA 15	S-P	30	0.17	1	3	2		1	Single Family Detached	SINGLE FAMILY RESIDENCE	39	3	3.56	Yes	Yes
2360711500	406404		-		U1	R-1-7	6.22	0.57	1	2			2	Single Family Detached	SINGLE FAMILY RESIDENCE	90	2	2.07	Yes	
2361110300	331516		-	South Centre City	SPA 15	S-P	30	0.12	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	56	2	1.00	Yes	Yes
2361110700	331520	FD	0.81	South Centre City	SPA 15	S-P	30	0.25	1	5	3		2	Single Family Detached	SINGLE FAMILY RESIDENCE	46	5	4.79	Yes	Yes
2361110800	331521	FD	0.81	South Centre City	SPA 15	S-P	30	0.14	1	2	1		1	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	46	2	1.38	Yes	Yes
2361110900	331522	FD	0.81	South Centre City	SPA 15	S-P	30	0.14	1	2	1		1	Single Family Detached	SINGLE FAMILY RESIDENCE	52	2	3.53	Yes	Yes
2361111000	34691	FD	0.81	South Centre City	SPA 15	S-P	30	0.28	1	5	3		2	Single Family Detached	SINGLE FAMILY RESIDENCE	38	5	5.38	Yes	Yes
2361120200	33938		-	South Centre City	SPA 15	S-P	30	0.13	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	52	2	1.24	Yes	Yes

Assessor Parcel Number	Parcel ID	Consolidated Site ID	Consolidated Area (Acres)	Specific Planning Area	General Plan	Zoning	Density	Site Area (Acres)	Existing Dwelling Units	Total New RHNA Units	New Lower Income Units	New Moderate Income Units	New Above Moderate Units	SANDAG Land Use	Assessor Land Use	Year Built	New Units / Existing Units Ratio	Land to Improvement Ratio	Fourth Cycle Site	Fifth Cycle Site
2361120500	331525		-	South Centre City	SPA 15	S-P	30	0.13	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	48	2	1.08	Yes	Yes
2361120800	33940	EZ	0.41	South Centre City	SPA 15	S-P	30	0.18	1	3		3	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	53	3	2.76	Yes	Yes
2361121300	183574	EZ	0.41	South Centre City	SPA 15	S-P	30	0.23	0	5		5	FALSE	Arterial Commercial	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2361122000	183581		-	South Centre City	SPA 15	S-P	30	0.14	1	3		3	FALSE	Single Family Detached	VACANT LAND COMMERCIAL	Unknown	3	>1; \$0 Assessed Improvement Value	Yes	Yes
2361122600	331528		-	South Centre City	SPA 15	S-P	30	0.23	0	3		3	FALSE	Single Family Multiple-Units	2 - 4 UNITS - GENERIC	72	No Existing Units	2.00	Yes	Yes
2361201500	183584	FC	1.19	South Centre City	SPA 15	S-P	30	0.36	1	8	6		2	Single Family Detached	VACANT LAND COMMERCIAL	Unknown	8	>1; \$0 Assessed Improvement Value	Yes	Yes
2361201600	183585	FC	1.19	South Centre City	SPA 15	S-P	30	0.18	1	3	2		1	Single Family Detached	SINGLE FAMILY RESIDENCE	40	3	29.00	Yes	Yes
2361201700	183586	FC	1.19	South Centre City	SPA 15	S-P	30	0.24	1	4	3		1	Single Family Detached	SINGLE FAMILY RESIDENCE	24	4	2.89	Yes	Yes
2361201800	183587	FC	1.19	South Centre City	SPA 15	S-P	30	0.23	0	4	3		1	Single Family Multiple-Units	GENERIC OFFICE/RETAIL 1-3 STORIES	50	No Existing Units	7.04	Yes	Yes
2361201900	183588	FC	1.19	South Centre City	SPA 15	S-P	30	0.19	1	3	2		1	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	25	3	4.17	Yes	Yes
2361202100	183590	FE	1.57	South Centre City	SPA 15	S-P	30	0.20	0	4	3		1	Arterial Commercial	GENERIC OFFICE/RETAIL 1-3 STORIES	Unknown	No Existing Units	2.00	Yes	Yes
2361202200	183591	FE	1.57	South Centre City	SPA 15	S-P	30	0.21	0	4	3		1	Arterial Commercial	GENERIC OFFICE/RETAIL 1-3 STORIES	67	No Existing Units	4.17	Yes	Yes
2361202600	5210866	FE	1.57	South Centre City	SPA 15	S-P	30	0.87	0	7	5		2	Single Family Multiple-Units	HOTEL/MOTEL - GENERIC	50	No Existing Units	4.80		Yes
2361202700	5210870	FE	1.57		GC	C-G	24	0.14	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	30	2	1.63	Yes	Yes
2361202800	5210869	FE	1.57	South Centre City	SPA 15	S-P	30	0.15	0	2	1		1	Arterial Commercial	GENERIC OFFICE/RETAIL 1-3 STORIES	69	No Existing Units	2.20	Yes	Yes
2361301600	34087		-		U3	R-3-18	18	0.31	1	3		3	FALSE	Single Family Detached	MEETING HALL/GYM	48	3	5.00	Yes	Yes

Assessor Parcel Number	Parcel ID	Consolidated Site ID	Consolidated Area (Acres)	Specific Planning Area	General Plan	Zoning	Density	Site Area (Acres)	Existing Dwelling Units	Total New RHNA Units	New Lower Income Units	New Moderate Income Units	New Above Moderate Units	SANDAG Land Use	Assessor Land Use	Year Built	New Units / Existing Units Ratio	Land to Improvement Ratio	Fourth Cycle Site	Fifth Cycle Site
2361620600	35511		-	South Centre City	SPA 15	S-P	30	0.14	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	54	2	1.83	Yes	Yes
2361710300	331551		-	South Centre City	SPA 15	S-P	30	0.44	0	10		10	FALSE	Religious Facility	CHURCH	52	No Existing Units	1.11		Yes
2361710700	35513	FK	0.22	South Centre City	SPA 15	S-P	30	0.15	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	54	2	2.55	Yes	Yes
2361711500	331558	FK	0.22	South Centre City	SPA 15	S-P	30	0.07	1	1		1	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	82	1	1.48		Yes
2361720200	331560		-	South Centre City	SPA 15	S-P	30	0.17	0	2		2	FALSE	Single Family Multiple-Units	DUPLEX - GENERIC	52	No Existing Units	1.22	Yes	Yes
2361720400	34751	FF	3.15	South Centre City	SPA 15	S-P	30	0.15	1	2	1		1	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	53	2	1.66	Yes	Yes
2361720500	34752	FF	3.15	South Centre City	SPA 15	S-P	30	0.15	1	2	1		1	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	48	2	9.01	Yes	Yes
2361720600	183605	FF	3.15	South Centre City	SPA 15	S-P	30	0.31	0	4	3		1	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	78	No Existing Units	1.44	Yes	Yes
2361720700	183606	FF	3.15	South Centre City	SPA 15	S-P	30	0.89	0	19	13		6	Arterial Commercial	GENERIC - RADIO STATION/BANK/MISC	56	No Existing Units	1.44		
2361720900	331562	FF	3.15	South Centre City	SPA 15	S-P	30	0.14	0	2	1		1	Single Family Multiple-Units	SINGLE FAMILY RESIDENCE	54	No Existing Units	2.55	Yes	Yes
2361721300	183607	FF	3.15	South Centre City	SPA 15	S-P	30	0.18	0	3	2		1	Arterial Commercial	SINGLE FAMILY RESIDENCE	23	No Existing Units	6.44	Yes	Yes
2361721400	707258	FF	3.15	South Centre City	SPA 15	S-P	30	0.17	0	4	3		1	Arterial Commercial	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2361721500	183594	FF	3.15	South Centre City	SPA 15	S-P	30	1.00	0	23	16		7	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	Unknown	No Existing Units	12.64		Yes
2361722000	331564		-	South Centre City	SPA 15	S-P	30	0.15	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	55	2	5.68	Yes	Yes
2361722500	35520		-	South Centre City	SPA 15	S-P	30	0.19	1	3		3	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	45	3	3.14	Yes	Yes
2361722600	183608	FF	3.15	South Centre City	SPA 15	S-P	30	0.15	0	3	2		1	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	Unknown	No Existing Units	4.67	Yes	Yes

Assessor Parcel Number	Parcel ID	Consolidated Site ID	Consolidated Area (Acres)	Specific Planning Area	General Plan	Zoning	Density	Site Area (Acres)	Existing Dwelling Units	Total New RHNA Units	New Lower Income Units	New Moderate Income Units	New Above Moderate Units	SANDAG Land Use	Assessor Land Use	Year Built	New Units / Existing Units Ratio	Land to Improvement Ratio	Fourth Cycle Site	Fifth Cycle Site
2361801800	183610	FG	0.84	South Centre City	SPA 15	S-P	30	0.27	0	5	3		2	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	53	No Existing Units	2.26	Yes	Yes
2361801900	183611	FG	0.84	South Centre City	SPA 15	S-P	30	0.25	0	4	3		1	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	60	No Existing Units	1.80	Yes	Yes
2361802000	34745	FG	0.84	South Centre City	SPA 15	S-P	30	0.19	1	3	2		1	Single Family Detached	SINGLE FAMILY RESIDENCE	46	3	3.13	Yes	Yes
2361802200	707190	FG	0.84	South Centre City	SPA 15	S-P	30	0.13	0	3	2		1	Arterial Commercial	PARKING LOT MINIMAL IMPROVEMENTS	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2362000701	708317	GH	1.68		U1	R-1-7	6.22	0.59	0	3			3	Other Public Services	MISC INST	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2362000801	708307	GH	1.68		U1	R-1-7	6.22	1.09	0	5			5	Other Public Services	MISC INST	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2362001800	708509		-		S	R-1-12	3.63	0.94	1	2			2	Single Family Detached	SINGLE FAMILY RESIDENCE	40	2	11.22	Yes	
2362002100	35877		-		S	R-1-12	3.63	0.92	1	2			2	Single Family Detached	SINGLE FAMILY RESIDENCE	38	2	12.12	Yes	
2362005200	5007201	GI	1.37		U1	R-1-7	6.22	0.92	0	4			4	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2362005300	708430	GI	1.37		U1	R-1-7	6.22	0.45	0	2			2	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2362231400	5042121		-	South Centre City	SPA 15	S-P	30	0.13	0	2		2	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	Unknown	No Existing Units	1.16	Yes	Yes
2362231700	183521	FO	0.30	South Centre City	SPA 15	S-P	30	0.15	0	2		2	FALSE	Arterial Commercial	SINGLE TENANT STAND ALONE RETAIL BLDG	66	No Existing Units	1.38	Yes	Yes
2362233400	707554	FO	0.30	South Centre City	SPA 15	S-P	30	0.15	0	3		3	FALSE	Arterial Commercial	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2362236700	707338	FL	0.42	South Centre City	SPA 15	S-P	30	0.17	0	4		4	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	Unknown	No Existing Units	0.58	Yes	Yes
2362237500	183600	FL	0.42	South Centre City	SPA 15	S-P	30	0.25	0	5		5	FALSE	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	88	No Existing Units	1.16	Yes	Yes

Assessor Parcel Number	Parcel ID	Consolidated Site ID	Consolidated Area (Acres)	Specific Planning Area	General Plan	Zoning	Density	Site Area (Acres)	Existing Dwelling Units	Total New RHNA Units	New Lower Income Units	New Moderate Income Units	New Above Moderate Units	SANDAG Land Use	Assessor Land Use	Year Built	New Units / Existing Units Ratio	Land to Improvement Ratio	Fourth Cycle Site	Fifth Cycle Site
2362237600	5237135		-	South Centre City	SPA 15	S-P	24	0.18	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	41	2	1.77		
2362237800	183599		-	South Centre City	SPA 15	S-P	30	0.29	0	5		5	FALSE	Other Retail Trade and Strip Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	38	No Existing Units	1.60	Yes	Yes
2362400400	708624		-		S	R-1-12	3.63	0.75	0	2			2	Religious Facility	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2362520300	5008417	FQ	0.77	South Centre City	SPA 15	S-P	30	0.42	0	8	6		2	Arterial Commercial	GENERIC RESTAURANT/NIG HT CLUB/TAVERN	73	No Existing Units	1.87	Yes	Yes
2362520400	183497	FQ	0.77	South Centre City	SPA 15	S-P	30	0.17	0	4	3		1	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	89	No Existing Units	0.63	Yes	Yes
2362520500	183498	FQ	0.77	South Centre City	SPA 15	S-P	30	0.17	0	3	2		1	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	55	No Existing Units	2.38	Yes	Yes
2362520700	183500	FT	0.53	South Centre City	SPA 15	S-P	30	0.36	0	7	5		2	Arterial Commercial		80	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2362520800	708332	FT	0.53	South Centre City	SPA 15	S-P	30	0.17	0	4	3		1	Arterial Commercial	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2362521500	183503	FX	1.15	South Centre City	SPA 15	S-P	30	0.86	0	17	12		5	Other Retail Trade and Strip Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	54	No Existing Units	9.50		Yes
2362523800	708565	FW	1.08	South Centre City	SPA 15	S-P	30	0.81	0	17	12		5	Office (Low-Rise)	MISC INST	77	No Existing Units	0.40		
2362523900	708622	FW	1.08	South Centre City	SPA 15	S-P	30	0.27	0	5	3		2	Office (Low-Rise)	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	78	No Existing Units	0.36		
2301620500	5053000	DC	1.98	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.17	0	4	3		1	Other Health Care	MEDICAL-DENTAL OFFICE	86	No Existing Units	0.79		
2301620600	5053001	DC	1.98	East Valley Specific Plan	Urban Residential IV/V	H-P	30	0.26	0	7	5		2	Other Health Care	GENERIC MEDICAL/DENTAL OFFICE	79	No Existing Units	0.76		
2362524200	183504	FX	1.15	South Centre City	SPA 15	S-P	30	0.29	0	6	4		2	Other Retail Trade and Strip Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	Unknown	No Existing Units	1.75	Yes	Yes

Assessor Parcel Number	Parcel ID	Consolidated Site ID	Consolidated Area (Acres)	Specific Planning Area	General Plan	Zoning	Density	Site Area (Acres)	Existing Dwelling Units	Total New RHNA Units	New Lower Income Units	New Moderate Income Units	New Above Moderate Units	SANDAG Land Use	Assessor Land Use	Year Built	New Units / Existing Units Ratio	Land to Improvement Ratio	Fourth Cycle Site	Fifth Cycle Site
2362600200	5008418	FR	1.02	South Centre City	SPA 15	S-P	30	0.61	0	13	9		4	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	49	No Existing Units	3.67		Yes
2362600400	183507	FU	0.95	South Centre City	SPA 15	S-P	30	0.37	0	7	5		2	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	46	No Existing Units	6.88	Yes	Yes
2293050200	5110600	AF	1.00	Downtown SPA	SPA 9	S-P	100	0.22	0	11	8		3	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	60	No Existing Units	1.09		
2362600500	183508	FU	0.95	South Centre City	SPA 15	S-P	30	0.58	0	12	8		4	Arterial Commercial	OFFICE/RETAIL BUILDING	Unknown	No Existing Units	0.39	Yes	
2362603800	183513	FV	1.27	South Centre City	SPA 15	S-P	30	0.24	1	4	3		1	Single Family Detached	SINGLE FAMILY RESIDENCE	53	4	8.00	Yes	Yes
2294310200	5110617			Downtown SPA	SPA 9	S-P	75	0.02	0	1	1		0	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	Unknown	No Existing Units	0.67		Yes
2362603900	183514	FV	1.27	South Centre City	SPA 15	S-P	30	0.25	0	5	3		2	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	53	No Existing Units	4.67	Yes	Yes
2362604800	183516	FR	1.02	South Centre City	SPA 15	S-P	30	0.42	0	9	6		3	Arterial Commercial	SERVICE STATION - GENERIC	99	No Existing Units	2.38	Yes	Yes
2362606100	152107		-		U2	R-2-12	12	0.36	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	50	2	1.71	Yes	
2362606400	288598	FS	0.67		U2	R-2-12	12	0.35	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	50	2	1.00	Yes	
2362606500	288599	FS	0.67		U2	R-2-12	12	0.32	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	50	2	3.55	Yes	
2362607700	288609		-		U2	R-2-12	12	0.33	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	50	2	1.30	Yes	
2362607900	183518	FV	1.27	South Centre City	SPA 15	S-P	30	0.78	0	17	12		5	Arterial Commercial	1 - 3 STORY OFFICE ONLY	80	No Existing Units	0.93	Yes	Yes
2362610400	190944		-		U2	R-2-12	12	0.50	1	4		4	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	14	4	2.28	Yes	Yes
2363010300	150860		-		S	R-1-12	3.63	0.98	1	2			2	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	24	2	1.72	Yes	
2363011500	150870		-	South Centre City	SPA 15	S-P	30	2.59	1	57	39		18	Spaced Rural Residential	SINGLE FAMILY RESIDENCE	35	57	160.01		
2363022200	708755		-	South Centre City	SPA 15	S-P	30	1.67	0	37	26		11	Arterial Commercial	GARAGE PARKING LOT/USED CAR	49	No Existing Units	8.90		

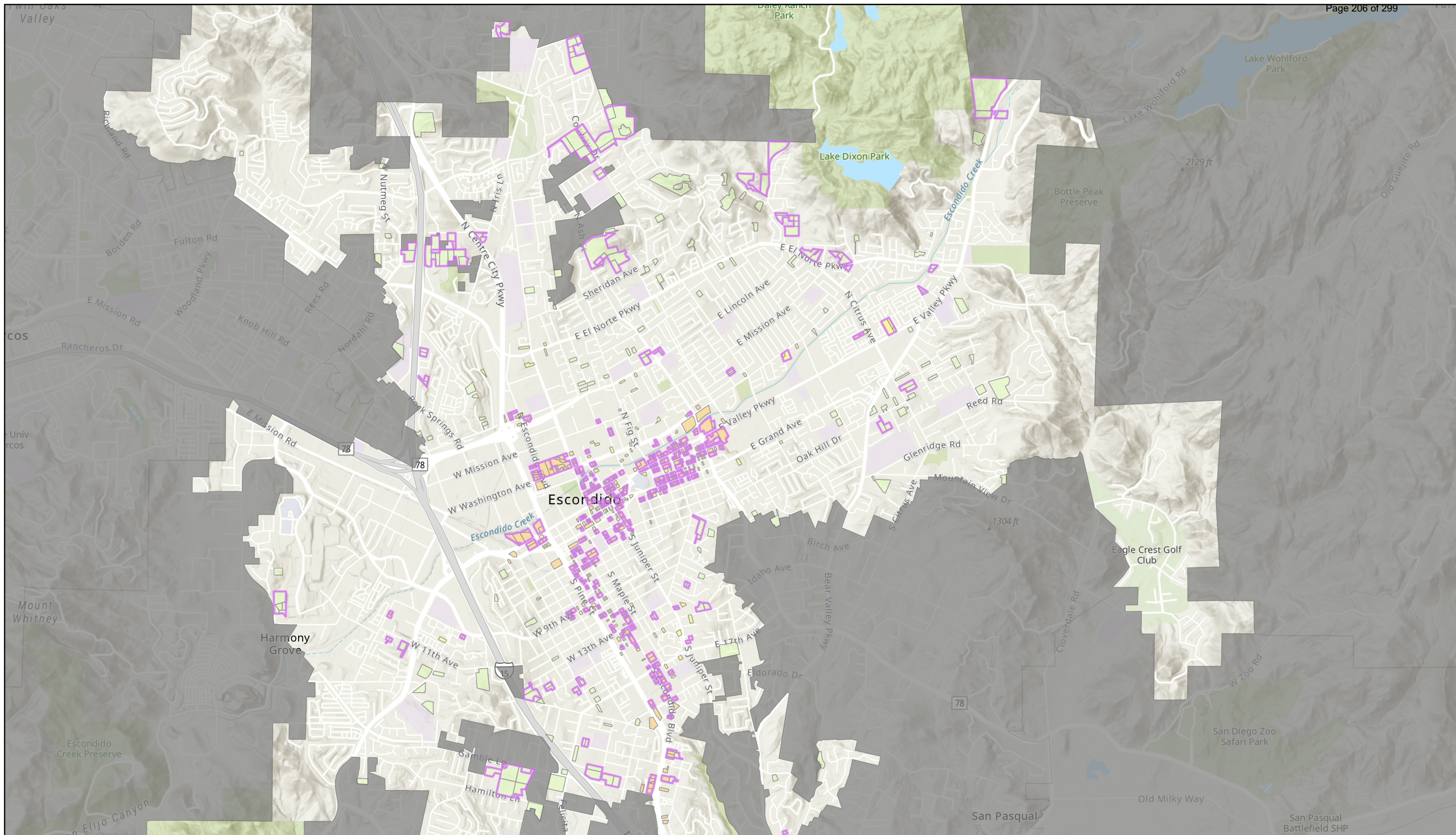
Assessor Parcel Number	Parcel ID	Consolidated Site ID	Consolidated Area (Acres)	Specific Planning Area	General Plan	Zoning	Density	Site Area (Acres)	Existing Dwelling Units	Total New RHNA Units	New Lower Income Units	New Moderate Income Units	New Above Moderate Units	SANDAG Land Use	Assessor Land Use	Year Built	New Units / Existing Ratio	Land to Improvement Ratio	Fourth Cycle Site	Fifth Cycle Site
2363111700	393370		-	South Centre City	SPA 15	S-P	30	1.00	0	22	15		7	Arterial Commercial	OFFICE/RETAIL BUILDING	75	No Existing Units	2.28		
2363112800	183564	FZ	0.59	South Centre City	SPA 15	S-P	30	0.29	0	6	4		2	Arterial Commercial	GENERIC OFFICE/RETAIL 1-3 STORIES	70	No Existing Units	2.36	Yes	
2363113200	183565	FZ	0.59	South Centre City	SPA 15	S-P	30	0.30	0	6	4		2	Arterial Commercial	GENERIC OFFICE/RETAIL 1-3 STORIES	60	No Existing Units	1.98	Yes	
2363130100	393373	FY	0.61	South Centre City	SPA 15	S-P	30	0.35	0	7	5		2	Arterial Commercial	1 - 3 STORY OFFICE ONLY	79	No Existing Units	0.40	Yes	Yes
2363130200	708511	FY	0.61		GC	C-G	24	0.26	0	4		4	FALSE	Parking Lot - Surface	PARKING LOT MINIMAL IMPROVEMENTS	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2363321200	300213		-		U1	R-1-7	6.22	0.59	1	2			2	Single Family Detached	SINGLE FAMILY RESIDENCE W/GRANNY FLAT	58	2	1.76	Yes	
2363323400	708947	GK	1.78		PO	R-1-10	4.356	0.90	0	3			3	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	8.01	Yes	Yes
2363323500	708939	GK	1.78		PO	R-1-10	4.356	0.88	0	3			3	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	6.09	Yes	
2363333200	300198	GL	7.54		PO	RE-20	2.178	2.81	1	4			4	Spaced Rural Residential	SINGLE FAMILY RESIDENCE - GENERIC	50	4	4.00	Yes	Yes
2363334100	709029		-		PO	RE-20	2.178	1.94	0	3			3	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2363334500	709323	GL	7.54		PO	RE-20	2.178	4.73	1	8			8	Spaced Rural Residential	VACANT RESIDENTIAL - GENERIC	Unknown	8	38.45	Yes	Yes
2363343500	709326		-		PO	RE-20	2.178	1.05	0	2			2	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2363355300	708901		-		E2	RE-20	2.178	0.95	0	2			2	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	
2363601500	709401	GM	6.57		PO	RE-20	2.178	2.64	0	4			4	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2363603200	709377	GM	6.57		PO	RE-20	2.178	3.92	0	6			6	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	

Assessor Parcel Number	Parcel ID	Consolidated Site ID	Consolidated Area (Acres)	Specific Planning Area	General Plan	Zoning	Density	Site Area (Acres)	Existing Dwelling Units	Total New RHNA Units	New Lower Income Units	New Moderate Income Units	New Above Moderate Units	SANDAG Land Use	Assessor Land Use	Year Built	New Units / Existing Units Ratio	Land to Improvement Ratio	Fourth Cycle Site	Fifth Cycle Site
2363900200	5079082	GO	3.83	South Centre City	SPA 15	S-P	30	0.30	0	6	4		2	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	47	No Existing Units	4.10	Yes	Yes
2363900300	183569	GO	3.83	South Centre City	SPA 15	S-P	30	0.33	1	6	4		2	Single Family Detached	SINGLE FAMILY RESIDENCE	47	6	2.47	Yes	Yes
2363901200	183570	GO	3.83	South Centre City	SPA 15	S-P	30	0.45	0	9	6		3	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	45	No Existing Units	4.71	Yes	Yes
2363905200	5210876	GO	3.83		U1	R-1-10	4.356	1.08	1	3			3	Single Family Detached	SINGLE FAMILY RESIDENCE	41	3	26.12	Yes	
2363905300	5210874	GO	3.83	South Centre City	SPA 15	S-P	30	0.85	1	18	12		6	Single Family Detached	SINGLE FAMILY RESIDENCE	28	18	25.61		Yes
2363905400	5210875	GO	3.83	South Centre City	SPA 15	S-P	30	0.81	0	18	12		6	Arterial Commercial	FACTORY/LIGHT MANUFACTURING	Unknown	No Existing Units	12.22		Yes
2364500200	35509		-		U2	R-2-12	12	0.30	1	2		2	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	52	2	1.60		
2364500500	35460		-		U2	R-2-12	12	0.40	1	3		3	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE	50	3	4.80		
2364501200	707227		-		U2	R-2-12	12	0.81	1	6		6	FALSE	Single Family Detached	SINGLE FAMILY RESIDENCE - GENERIC	36	6	1.80		
2364601600	183523	FN	2.22	South Centre City	SPA 15	S-P	30	1.05	0	23	16		7	Office (Low-Rise)	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	85	No Existing Units	1.24		Yes
2364602400	152105	FP	0.93		U2	R-2-12	12	0.29	0	1		1	FALSE	Single Family Multiple-Units	2 - 4 UNITS - GENERIC	47	No Existing Units	3.64	Yes	Yes
2364602600	183525	FP	0.93	South Centre City	SPA 15	S-P	30	0.14	0	3	2		1	Other Retail Trade and Strip Commercial	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1 ; \$0 Assessed Improvement Value	Yes	Yes
2364602700	183526	FP	0.93	South Centre City	SPA 15	S-P	30	0.17	0	4	3		1	Other Retail Trade and Strip Commercial	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1 ; \$0 Assessed Improvement Value	Yes	Yes
2364606000	5253563	FP	0.93	South Centre City	SPA 15	S-P	30	0.33	0	6	4		2	Other Retail Trade and Strip Commercial	GENERIC RESTAURANT/NIGHT CLUB/TAVERN	2	No Existing Units	1.02	Yes	Yes
2364606300	183527	FN	2.22	South Centre City	SPA 15	S-P	30	1.16	0	25	17		8	Other Retail Trade and Strip Commercial	AUTOMOTIVE REPAIR GARAGES	89	No Existing Units	0.90	Yes	Yes
2370204600	707327		-		E2	RE-20	2.178	9.05	0	15			15	Religious Facility	CHURCH RECTORY, PRKG & OTHER CHURCH RELATED	Unknown	No Existing Units	1.79		

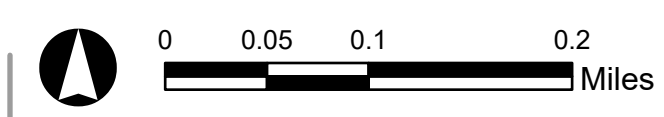
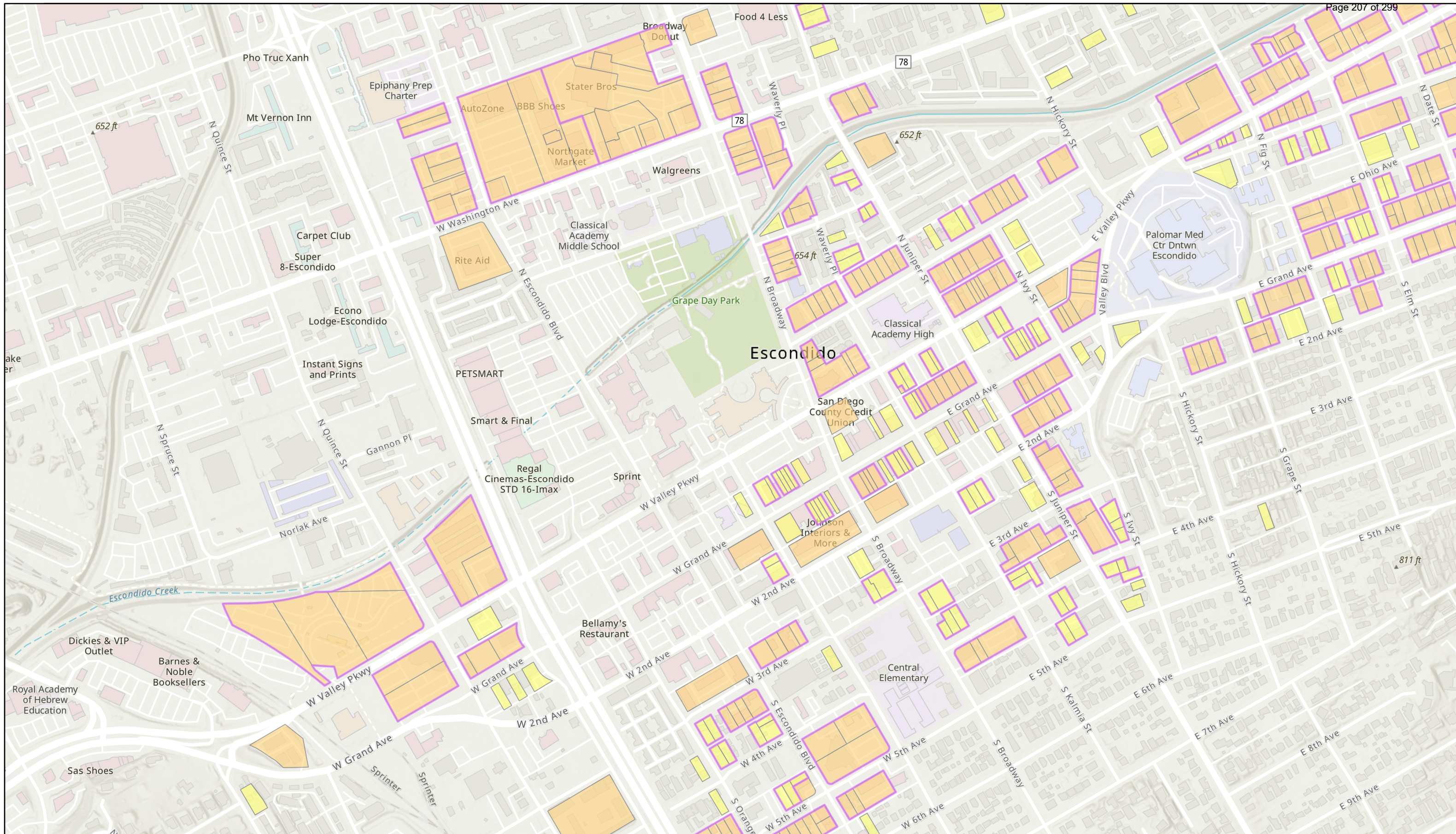
Assessor Parcel Number	Parcel ID	Consolidated Site ID	Consolidated Area (Acres)	Specific Planning Area	General Plan	Zoning	Density	Site Area (Acres)	Existing Dwelling Units	Total New RHNA Units	New Lower Income Units	New Moderate Income Units	New Above Moderate Units	SANDAG Land Use	Assessor Land Use	Year Built	New Units / Existing Units Ratio	Land to Improvement Ratio	Fourth Cycle Site	Fifth Cycle Site
2371411900	5370248		-		E1	PD-R-1.02	1.02	2.71	0	2			2	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	
2380730600	709423	GJ	34.37		E1	RE-40	1.089	9.79	0	8			8	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2380733800	709457	GJ	34.37		E1	RE-40	1.089	4.83	0	4			4	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2380734900	709295	GJ	34.37		E1	RE-40	1.089	6.61	0	5			5	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2380735500	709304	GJ	34.37		E1	RE-40	1.089	4.00	0	3			3	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2380735700	203372	GJ	34.37		E1	RE-40	1.089	9.14	0	7			7	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	
2381012300	709381		-		PO	RE-40	1.089	8.75	0	7			7	Religious Facility	CHURCH	Unknown	No Existing Units	1.21		
2381302400	709483		-	South Centre City	SPA 15	S-P	30	0.77	1	16	11		5	Single Family Detached	SINGLE FAMILY RESIDENCE	55	16	0.73	Yes	
2381303000	709468	GN	4.05	South Centre City	SPA 15	S-P	30	1.14	0	25	17		8	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	88	No Existing Units	0.48	Yes	Yes
2381303100	709512	GN	4.05	South Centre City	SPA 15	S-P	30	1.05	0	24	17		7	Arterial Commercial	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		Yes
2381303500	709389	GN	4.05	South Centre City	SPA 15	S-P	30	0.71	0	16	11		5	Vacant and Undeveloped Land	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		Yes
2381303700	709420	GN	4.05	South Centre City	SPA 15	S-P	30	0.81	0	17	12		5	Arterial Commercial	PUBLIC BUILDING - SCHOOL, FIREHOUSE, LIBRARY, ETC	85	No Existing Units	0.65	Yes	Yes
2381303800	709452	GN	4.05	South Centre City	SPA 15	S-P	30	0.34	0	8	6		2	Arterial Commercial	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2381411600	5376096	GP	2.92		U1	R-1-10	4.356	1.27	1	3			3	Single Family Detached	SINGLE FAMILY RESIDENCE	53	3	3.71	Yes	Yes

Assessor Parcel Number	Parcel ID	Consolidated Site ID	Consolidated Area (Acres)	Specific Planning Area	General Plan	Zoning	Density	Site Area (Acres)	Existing Dwelling Units	Total New RHNA Units	New Lower Income Units	New Moderate Income Units	New Above Moderate Units	SANDAG Land Use	Assessor Land Use	Year Built	New Units / Existing Units Ratio	Land to Improvement Ratio	Fourth Cycle Site	Fifth Cycle Site
2381411800	5376006	GP	2.92	South Centre City	SPA 15	S-P	30	1.65	0	36	25		11	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	63	No Existing Units	1.37		Yes
2381413300	5376012		-	South Centre City	SPA 15	S-P	30	0.77	0	17	12		5	Arterial Commercial	GENERIC COMMERCIAL OFFICE/RETAIL 1-3 STORIES	74	No Existing Units	1.31		Yes
2381413700	5376044		-	South Centre City	SPA 15	S-P	30	0.97	0	22	15		7	Office (Low-Rise)	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		Yes
2381520600	709788		-	South Centre City	SPA 15	S-P	30	0.53	0	12	8		4	Arterial Commercial	VACANT LAND COMMERCIAL	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	
2381521500	183559		-	South Centre City	SPA 15	S-P	30	0.68	0	14	10		4	Arterial Commercial	GENERIC RESTAURANT/NIGHT CLUB/TAVERN	71	No Existing Units	2.67		Yes
2383606800	709649		-		E1	RE-40	1.089	5.90	0	5			5	Vacant and Undeveloped Land Spaced Rural Residential	VACANT RESIDENTIAL - GENERIC SINGLE FAMILY RESIDENCE	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		Yes
2384701500	565280		-		E2	RE-20	2.178	2.28	1	3			3			82	3	1.11	Yes	Yes
2390511000	709396		-		E2	RE-40	1.089	1.02	0	1			1	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2391312900	709815	GQ	9.04		E2	RE-20	2.178	0.46	0	1			1	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		Yes
2400103000	700646		-		R1	RA-5	0.2	4.49	0	1			1	Orchard or Vineyard		Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		Yes
2400104100	5266551	R	40.98		R1	RA-5	0.2	7.59	0	1			1	Vacant and Undeveloped Land	IRRIGATED FARM VACANT WATER AVAILABLE	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		Yes
2401009000	1554380		-		E2	RE-20	2.178	0.96	0	2			2	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	Yes
2402001100	189629		-		E2	RE-20	2.178	2.60	1	3			3	Spaced Rural Residential	SINGLE FAMILY RESIDENCE - GENERIC	58	3	2.09	Yes	Yes
2402001900	704041		-		E2	RE-20	2.178	11.54	0	19			19	Intensive Agriculture	CITRUS	Unknown	No Existing Units	10.63	Yes	Yes

Assessor Parcel Number	Parcel ID	Consolidated Site ID	Consolidated Area (Acres)	Specific Planning Area	General Plan	Zoning	Density	Site Area (Acres)	Existing Dwelling Units	Total New RHNA Units	New Lower Income Units	New Moderate Income Units	New Above Moderate Units	SANDAG Land Use	Assessor Land Use	Year Built	New Units / Existing Units Ratio	Land to Improvement Ratio	Fourth Cycle Site	Fifth Cycle Site
2301410100	5394690		-	East Valley Specific Plan	Urban Residential IV/V	C-G	30	4.26	0	106	73		33	Vacant and Undeveloped Land		Unknown	No Existing Units	>1; \$0 Assessed Improvement Value		
2402101800	705502		-		E2	RE-20	2.178	1.67	0	3			3	Vacant and Undeveloped Land	VACANT RESIDENTIAL - GENERIC	Unknown	No Existing Units	>1; \$0 Assessed Improvement Value	Yes	
2702611900	183789		-		E1	RE-40	1.089	5.64	1	4			4	Spaced Rural Residential	SINGLE FAMILY RESIDENCE	60	4	9.26		
7601695400	5241467	BK	1.37	Downtown SPA	SPA 9	S-P	75	0.72	0	27	19		8	Office (Low-Rise)	GENERIC- RADIO STATION/BANK/M ISC	Unknown	No Existing Units	0.67	Yes	



CITY OF ESCONDIDO HOUSING ELEMENT
Housing Sites



Above Moderate

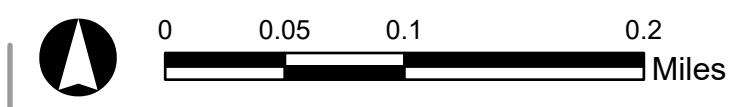
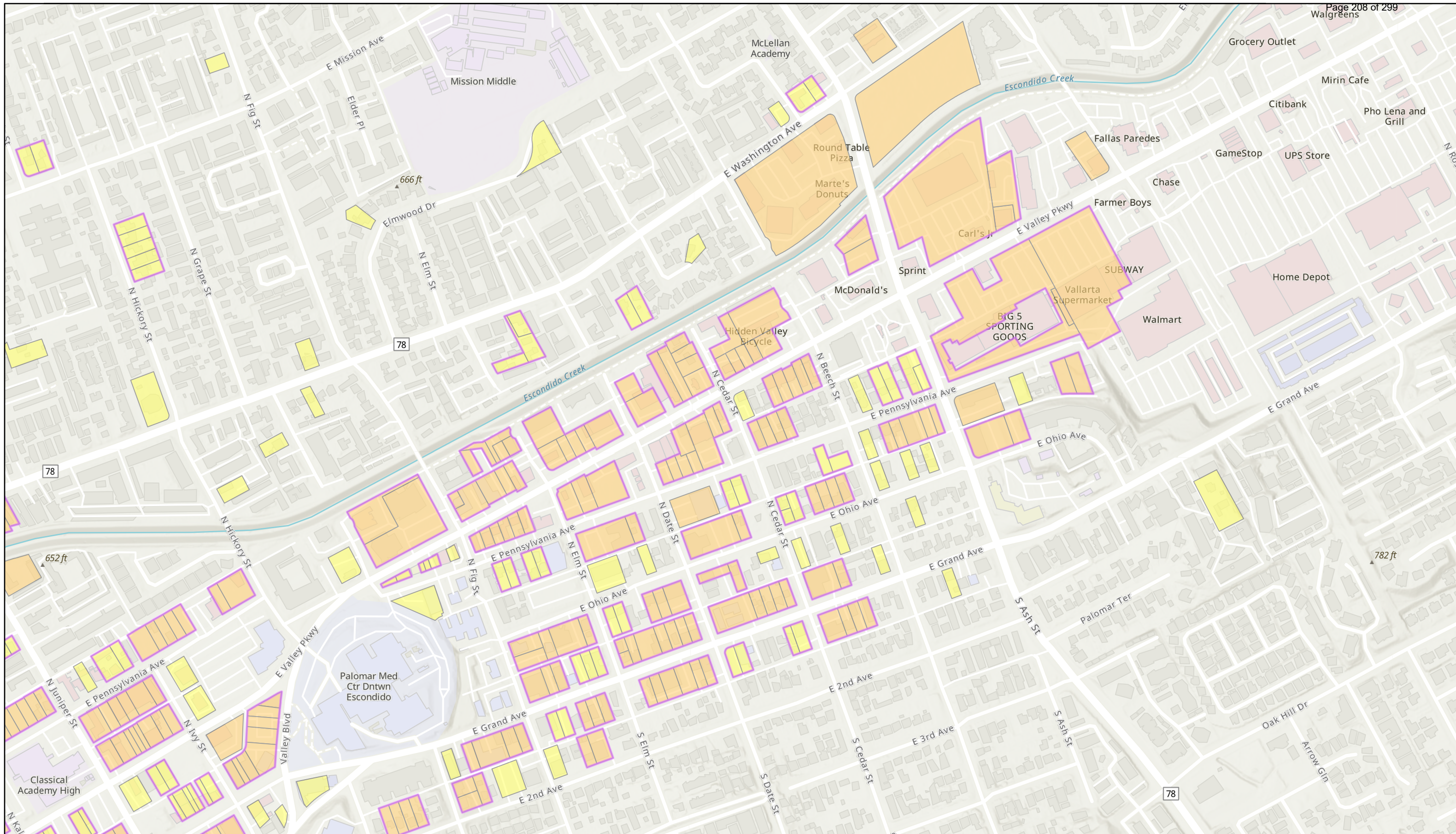
Moderate

Lower

Consolidated Sites

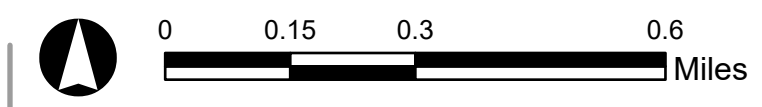
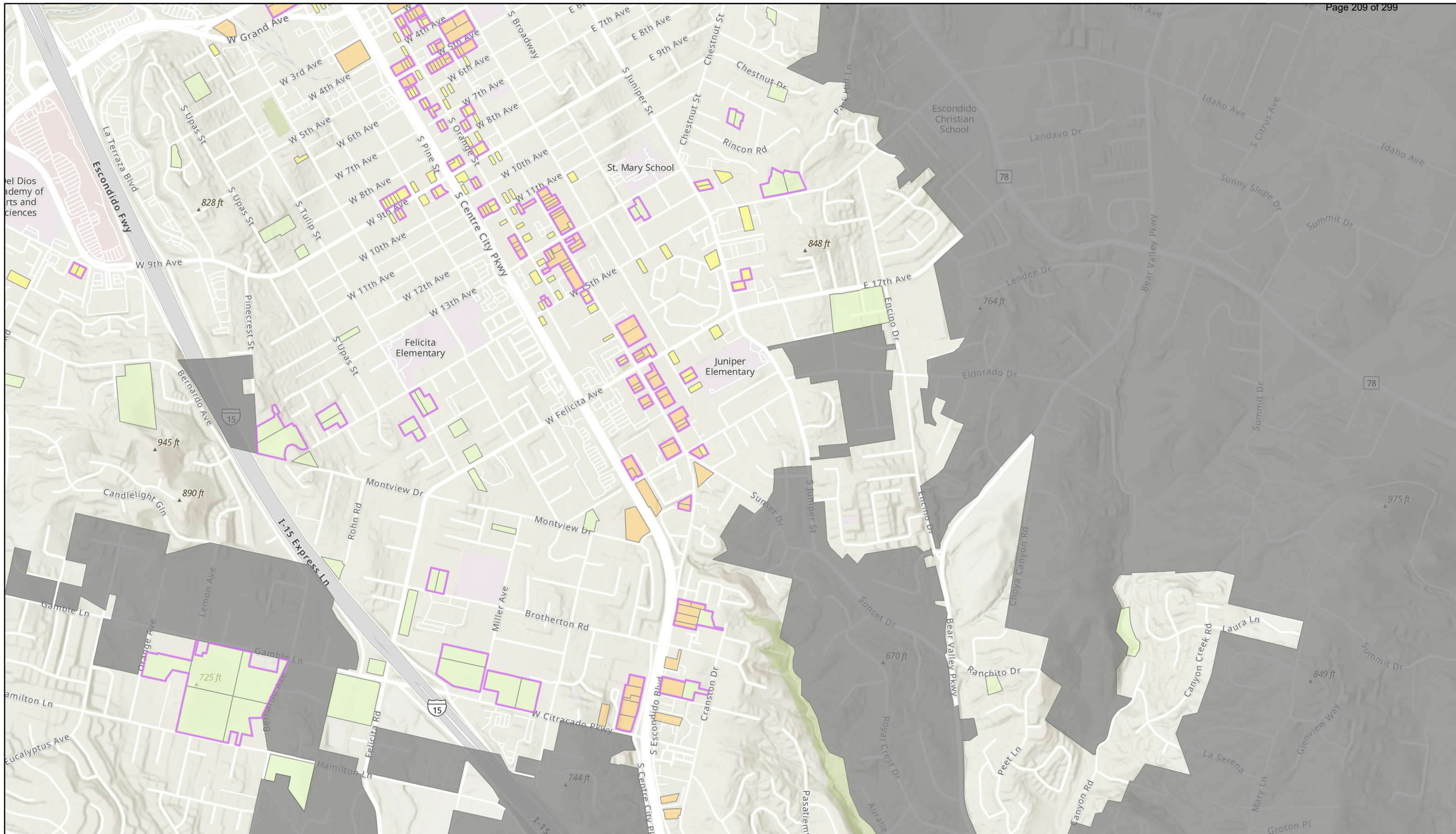
CITY OF ESCONDIDO HOUSING ELEMENT Housing Sites

DOWNTOWN



- Above Moderate
- Moderate
- Lower
- Consolidated Sites

CITY OF ESCONDIDO HOUSING ELEMENT
Housing Sites



- Above Moderate
- Moderate
- Lower
- Consolidated Sites



Strip Commercial

			
611 E Valley Pkwy, APN: 23009409, BN	711 E Valley Pkwy, APN: 23009303, BP	1040 E Valley Pkwy, APN: 23013216, BH	1073 E Valley Pkwy, APN: 23012106, BS
			
131 S Broadway, APN: 23306210	218 E Grand Ave, APN: 22943121, CJ	548 N Broadway, APB: 22930416, AH	1873 S Escondido Blvd, APN: 23626079, FV
			
1733 S Escondido Blvd, 23625203, FQ	899 S Pine St, 23335114	450 W 9th Ave, 23335213, ET	1208 S Escondido Blvd, 23612026, FE
			
1630 S Escondido Blvd, 23646016, FN	1630 S Escondido Blvd, 23646063, FN	970 E Valley Pkwy, APN: 2301313100, BG	845 E Valley Pkwy, APN: 2301111000

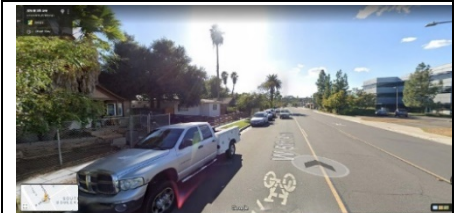


Office/Medical

			
312 S Juniper St, APN: 22947210, DR	625 E Grand Ave, APN: 23025116, DJ	425 W 5 th Ave, APN: 22321214, EJ	1733 S Escondido Blvd, APN: 23625203, FQ
			
806 E Grand Ave, APN: 2301811000, DE	1002 Grand Ave, APN: 2301822600, CS	255 N Ash St, APN: 2301920500, BZ	200 N Ash, APN: 2302102600, BY
			
901 E Ohio Ave, APN: 2301822400	910 E Ohio Ave, APN: 2301722100, CS	161 N Date St, APN: 2301811700, DA	925 N Pennsylvania, APN: 2301721900
			
462 N Elm St, APN: 2301042900, BE	457 N Elm St, APN: 2300921700, BC	560 E Valley Pkwy, APN: 2293201300	342 S Broadway, APN: 2331621500, DY



Single Family Residential



327 W 5th Ave, EK, APN: 23323105



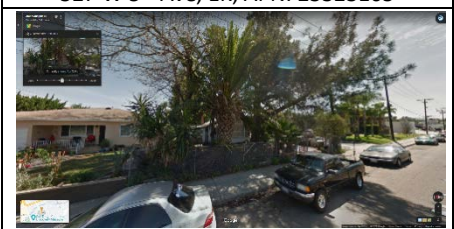
420 W 11th, EY, APN: 23606208



1900 Sunset Dr, FY, APN: 23631301



501 E 9th Ave, EW, APN: 23605120



350 N Juniper St SFH active project site, 22931012



419 N Cedar St, APN: 2301311900, BG

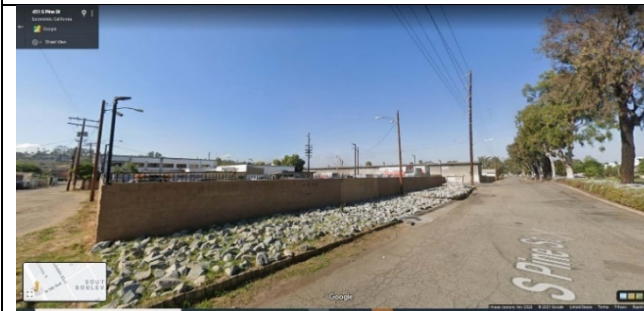


1231 S Orange St, APN: 2361110900, FD

DRAFT



Industrial/Warehouse



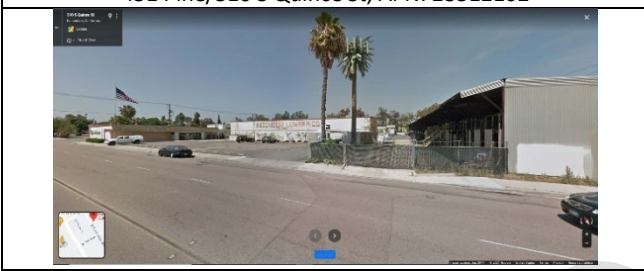
451 Pine/310 S Quince St, APN: 23312102



220 N Quince St, APN: 22933110



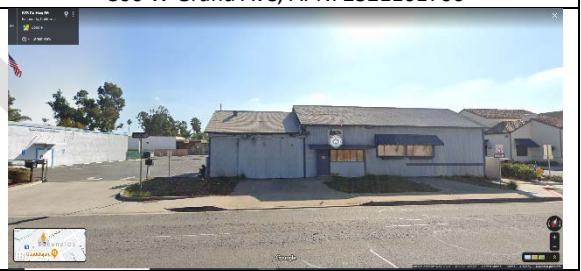
800 W Grand Ave, APN: 2321101700



310 S Quince St, APN: 23312102



520 W Valley Pkwy, APN: 2293311600, AR



523 W Valley Pkwy, APN: 2294011700

DRAFT



Churches

			
444 S Escondido Blvd; APN: 23315022, EI; before and after church demolition		1873 S Escondido Blvd, APN: 23625215, FX	611 E Valley Pkwy, BN, APN: 23009409
			
1331 S Orange St, APN: 23617103	950 E Ohio Ave, 23018206	0 Encino Dr, APN: 23702046	

DRAFT



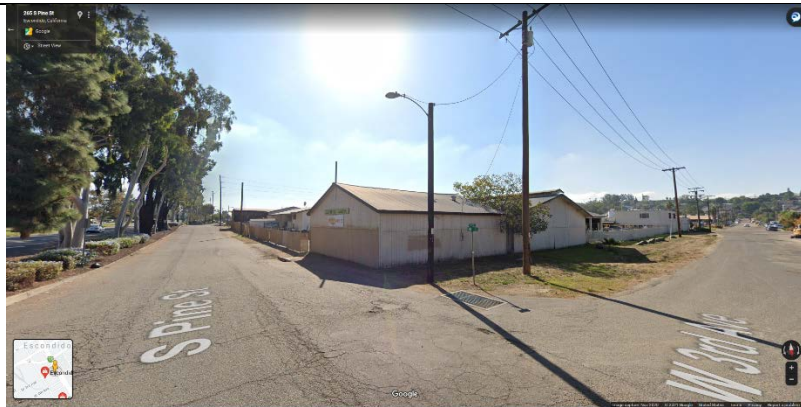
Recent Projects Before and After



Quince Street Senior Housing, 220 N Quince St., APN: 22933110
Industrial Warehouse Processing to Affordable Senior Housing
145-unit (100 du/ac) 100% Affordable High Density Multi-family overcame Low (0.72) Land-to-Improvement Ratio



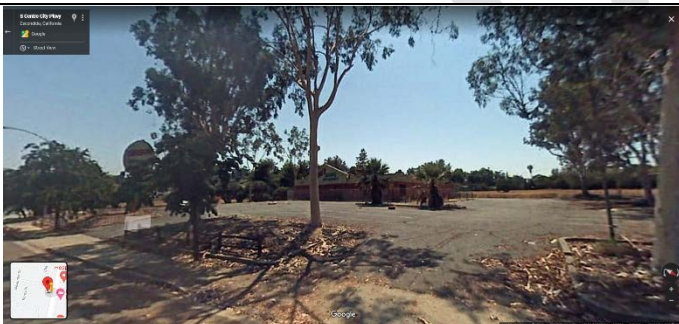
300 S Escondido Blvd; APN: 23314214
Strip Commercial, Restaurant, Retail to High Density Residential Mixed Use



Casa Mercado, 235 S. Pine Street and surrounding properties
APNs (233-032-07, 233-032-08, 233-032-10, 233-032-11, 233-032-12, 233-032-13, 233-032-14, 233-032-17, 233-032-18, 233-032-19, 233-032-21)
2 Single-Family homes, Restaurant, Corner Market, Hardware and Industrial to Multifamily
Consolidated 11 parcels all < 0.5 acres with 5 separate owners



Warmington Residential, 2204 S Escondido Blvd,
Multiple APNs (236-390-02, 236-390-03, 236-390-52, 236-390-53, 236-390-54)
Welding business and Single-family home to Multi-family



Del Prado, 2329 S. Centre City Pkwy
Multiple APNs (238-130-11, 238-130-26, 238-130-27, 238-130-35, 238-130-36)
Woody's Restaurant and Single Family Home to 113-unit Multifamily
Consolidated 5 lots with 3 owners, including a parcel less than 0.5 acres



Palomar Heights, 555 E. Valley Pkwy
Multiple APNs (22944201, 22944202, 22944203, 22944204, 22944218, 22945005, 22945006, 23016301, 23016302, 23016303, 23016304, 23016305)
Former Hospital Site to Mixed Use Residential

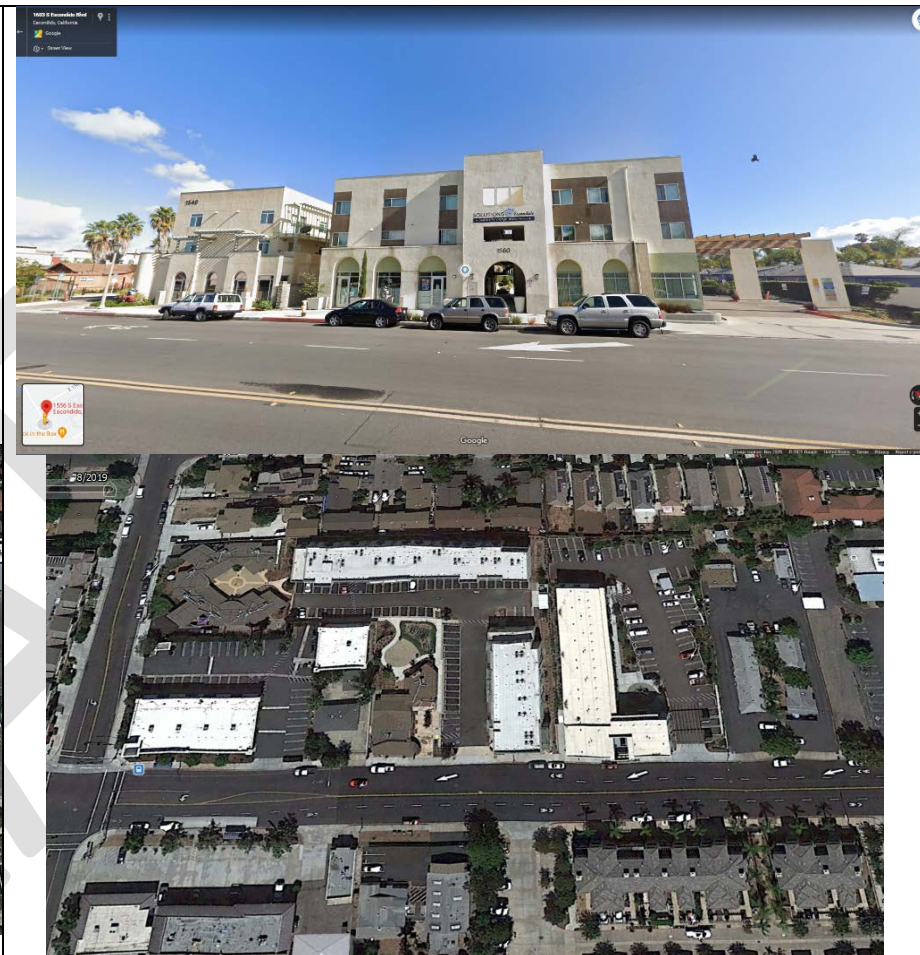
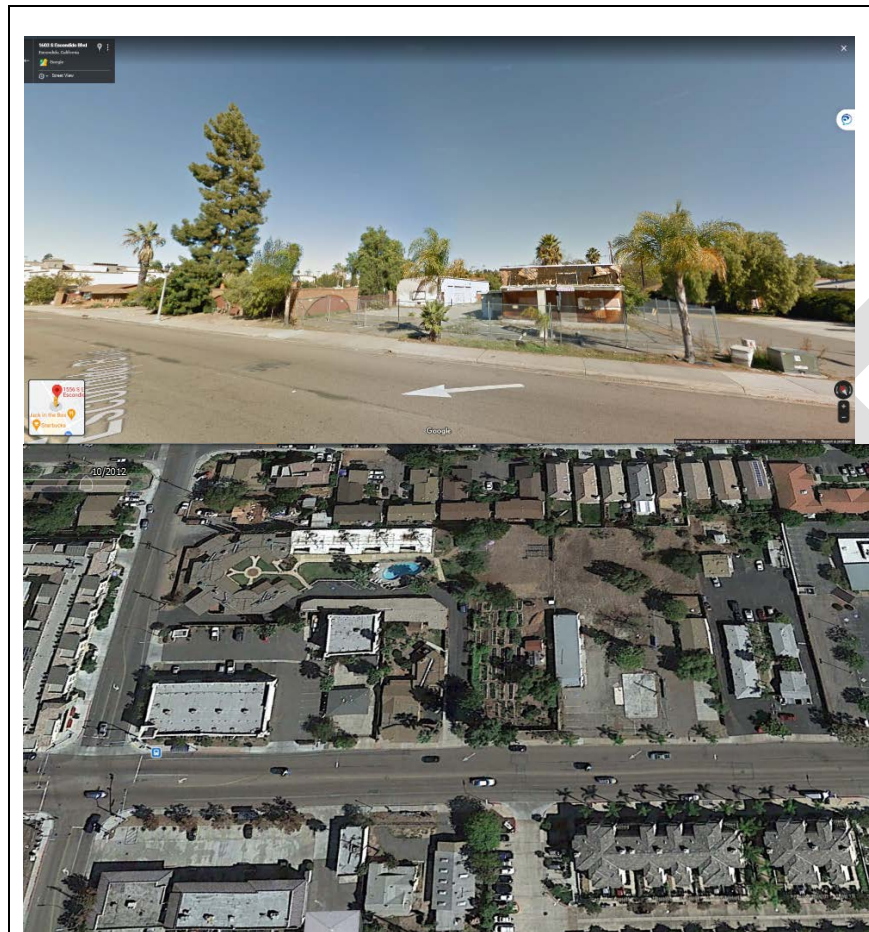


Touchstone Ivy, 343 E. 2nd Ave.

Multiple APNs (22947108, 22947109, 22947110, 22947111, 22947112, 22947113)

Former Large Medical Office Building (Escondido Surgery Center)

95-unit (95 du/ac), 100% affordable, High Density Multi-family overcome Very Low (0.37) Land-to-Improvement Ratio



Veteran's Village, 1556 S. Escondido Blvd
Multiple APNs (2364605900, 2364600400, 2364600500, 2364600900)
Multiple 5-15 Unit Residential, 1-story strip retail, commercial, Vacant Commercial
54-unit affordable for veteran families, 30 du/ac, 1.37 Land-to-Improvement Ratio



Appendix C: Public Participation

East Valley FAQs	
Question	Answer
Old Palomar Hospital	
What is the Old Palomar Hospital Project?	Integral Communities has submitted an application for the redevelopment of the former Palomar Hospital site and surrounding properties in downtown Escondido. The application includes a request for a Specific Plan Amendment, Master and Precise Development Plan, Tentative Map, General Plan Amendment (Circulation Element), and Development Agreement to construct a multi-family mixed-use (commercial/residential) project. The current proposal shows 258 apartment units (for-rent), 90 senior apartment units (for-rent), and 162 row-homes and villas (for-sale), with accessory residential amenities and up to 12,000 square feet of commercial/office space on approximately 13.8 acres at the east end of downtown.
How does the Old Palomar Hospital Project relate to the East Valley Specific Plan Project?	The project is just outside of the Western boundary of the East Valley Specific Plan Area. If the project is developed it will bring a number of different housing opportunities to the area.
Where can I learn more?	https://www.escondido.org/palomarheights.aspx
City-wide Housing Element	
What is the City-wide Housing Element?	The demand for new housing continues to increase. To address current and future housing needs, The City is working on a new framework to build more housing. This framework will guide Escondido's future housing policy and shape how the City grows. The Housing and Community Investment Study identifies the City's housing needs and establishes clear goals and objectives to inform future housing decisions. The City needs to determine where future housing should be located and what it should look like once built. And we need your help. The Housing and Community Investment Study will allow the public, stakeholders, developers, decision-makers, and staff to work together to address things like how best to increase or accommodate affordability, substandard housing rehabilitation, existing demand for new housing, eliminating housing development constraints, and promote fair housing.
Housing and Community Investment Study	
What is the Housing and Community Investment Study?	The City is developing three different housing studies and plans: a Housing Element Update, a Sector Feasibility Study, and an East Valley Specific Plan. These three housing studies and plans will be linked together, through a common work program theme, called the "Housing and Community Investment Study."
What does the Housing Element Update identify?	<ul style="list-style-type: none"> • Where new housing should go. • Policies for rehabilitation and conservation of the existing affordable housing stock. • The current Housing Element sets a number of ambitious goals to increase housing production and preservation, ensure neighborhood livability, prevent discrimination, and end homelessness.
What does the Sector Feasibility Study identify?	<ul style="list-style-type: none"> • Determine what Information and assess if, and to what degree, housing development is financially/economically feasible under rising construction, land, and regulatory costs.



East Valley FAQs	
Question	Answer
What does the East Valley Specific Plan identify?	<ul style="list-style-type: none"> • A comprehensive planning and zoning scheme for the East Valley area. • Locations that would be appropriate for future housing and what that housing should look like. • New ways to accommodate streamlined housing with community-supported solutions.
What will Public Participation Look Like?	The success of this Study requires community engagement and input. There will be multiple opportunities to participate throughout the process. A goal of the Housing and Community Investment Study is to ensure that the future housing strategies embrace the distinct identity and character of Escondido where one can live their entire life with housing for all ages, incomes and abilities. During the course of the Study, the City will work with development experts, community-based interest groups, stakeholders, and the community at large to achieve the best plan possible through engagement tools including meetings, community workshops, and online engagement.
Where can I learn more?	Visit the Project Website at https://www.escondido.org/hcis.aspx
Escondido Creek Trail	
What is the Escondido Creek Trail Project?	<p>The City of Escondido has been awarded \$8.5 million from the California Parks Department to fund the Escondido Creek Trail Expansion and Renovation Project. These funds, made available through the Prop 68 Statewide Park Development and Community Revitalization Program, will bring to life the community's vision for revitalizing the Escondido Creek Trail and turning it into a premier linear park.</p> <p>The Escondido Creek Trail Expansion and Renovation project would improve approximately 4.5 miles of the existing Escondido Creek Trail (between Harmony Grove Road and Midway Drive) and add approximately 0.4 miles of new bicycle path (between Harmony Grove Road and the Citracado Parkway extension) to the linear park. This project will create a double-sided trail on approximately 1.7 miles; on one side will be the existing Class I bicycle path, on the other will be a new DG trail.</p> <p>Opening the closed side of the Creek Trail, removing asphalt and building a firm surface path, and adding recreation features will add approximately 1.7 miles of new trail and 2.5 acres of parkland, in the heart of Escondido's severely/disadvantaged community area. Expanding into this space will separate users in a way that will enhance the use for both. Bicycles and skateboarders will be able to travel at their desired rate of speed without worrying about small children wandering in the path. Pedestrians and joggers will have a path that is better designed for their physical needs and will have amenities such as adult fitness equipment, children's play pockets and pocket gardens.</p>
What are the Creek Channel improvements and how do they relate to the East Valley Specific Plan Area?	<p>The improvements within the East Valley Specific Plan Area will be between Broadway and Rose Street will be more extensive and will include:</p> <ul style="list-style-type: none"> • Vinyl chain link fencing (6' +/-) replacing existing and adding new fence along the top of the channel • Upgraded fencing (6') for first 100 feet from each roadway intersection (tubular steel) • Trail gateways, monuments and signage • Decorative murals on some of the concrete flood channel walls • Trash/recycling receptacles, dog waste bag stations, water filling stations, benches and up to 21 activity stations (fitness, adventure play, skate features) • Over 1.5 acres of landscaping and up to 50 trees with irrigation • Cantilevered trees/viewing areas
Where can I learn more?	https://www.escondido.org/ECT.aspx



East Valley FAQs	
Question	Answer
Other	
What is the City currently doing for businesses needing assistance due to COVID-19?	<ul style="list-style-type: none"> • Temporary Business Recovery strategy – allow businesses for outdoor dining permitting procedures and waived certain permits to provide relief
What do I need to pay in order to build my project?	<ul style="list-style-type: none"> • The City recently implemented a City-wide Community Facilities District (CFD) for new projects for future maintenance so that revenue is neutral. • This website has more information: https://www.escondido.org/community-facilities-districts.aspx



City of Escondido

Incorporated in 1888, Escondido is a full-service, general-law city, under the Council-Manager form of government, with five council members. For more information visit: escondido.org

escondido.org

More info...

Subscribe

Activity



Community Meeting to Discuss Housing in the East Valley!

City of Escondido Communications Officer from City of Escondido - 20 Jul

The City was recently awarded grant funding to develop three different housing studies and plans: a Housing Element Update, a Sector Feasibility Study, and an East Valley Specific Plan.

These three housing studies and plans will be linked together, through a common work program theme, called the "Housing and Community Investment Study."

There is an online Community Meeting this Thursday, July 23 from 6:00 - 8:00 p.m. to discuss the East Valley Specific Plan. Find out more at: <https://www.escondido.org/hcis.aspx>



HCIS - City of Escondido
ESCONDIDO.ORG



City of Escondido Housing Survey

We Want to Hear from You!

Survey Introduction

As part of the City of Escondido Housing and Community Investment Study, the City is updating housing goals and policies as part of the General Plan Housing Element. The Housing Element includes actions that the City is planning to address for both current and projected housing needs. The City is looking for input from the community about housing needs so that the City Council can use this input to update current housing objectives and prioritize housing funds over the next several years. Please take a few minutes to complete a short survey to assist with this effort.

All survey responses are anonymous and results from the survey when presented, will be presented as a total.

1. Are you: (Please select all that apply.)
 - a. An Escondido Resident
 - b. An Escondido Rental Residential Property Owner (Landlord)
 - c. An Escondido Business Owner
 - d. A representative of a service agency serving Escondido residents
 - e. Homeless
 - f. Other

RENTERS ONLY

2. How long have you lived in Escondido?
 - a. Less than 5 years.
 - b. 5 -10 years
 - c. More than 10 years
3. Please check all that apply to you:
 - a. I am a Senior (65 years or over)
 - b. I am a Person with Disabilities
 - c. I live in a large household (five or more persons renting in your home)
 - d. Veteran
 - e. Single-person household
 - f. Not applicable to me.
4. How well is the property you rent being maintained?
 - a. Very well maintained. Property maintenance and repair needs are addressed quickly.
 - b. Well maintained. Property maintenance and repair needs are addressed.
 - c. Not well maintained. Property maintenance and repair needs sometimes are not performed.
 - d. Poorly maintained. Property maintenance and repair needs usually are not performed.
 - e. Not maintained. Property maintenance and repair needs are not performed.

HOMEOWNERS ONLY

5. About how much do you spend annually on property maintenance, repair, or improvement work?
 - a. None
 - b. Under \$1,000
 - c. \$1,000 - \$5,000
 - d. \$5,001 – \$10,000
 - e. Over \$10,000
 - f. I Don't Know
6. What, if any, major housing repair or improvement work do you have planned over the next five years (check all that apply)?
 - a. Roof Replacement
 - b. Water Heater / Furnace Replacement
 - c. Interior Remodel (e.g. bathroom or kitchen remodel)
 - d. Exterior Remodel (e.g. window or siding replacement)
 - e. Solar Panel Installation
 - f. Home Expansion
 - g. Other (Please List): _____
7. Within the last three years, have you tried obtaining a home equity loan to pay for housing repairs?
 - a. Yes
 - i. If Yes, were you successful in acquiring a loan?
 1. Yes
 2. No
 - b. No

LANDLORDS ONLY

8. What type of rental properties do you own (check all that apply)?
 - a. Single-family home(s)
 - b. Duplex, Tri-plex, or Condominium(s)



- c. ___ Apartment complex with fewer than 5 units
 - d. ___ Apartment complex with 5 to 20 units
 - e. ___ Apartment complex with more than 20 units
9. On average, about how much do you spend annually on property maintenance, repair, or improvement work **per unit**?
- a. None
 - b. Under \$1,000
 - c. \$1,000 - \$5,000
 - d. \$5,001 – \$10,000
 - e. Over \$10,000
10. What, if any, major housing repair or improvement work is planned over the next five years (check all that apply)?
- a. ___ Roof Replacement
 - b. ___ Water Heater / Furnace Replacement
 - c. ___ Drainage/landscape irrigation repair
 - d. ___ Interior Remodel (e.g. bathroom or kitchen remodel)
 - e. ___ Exterior Remodel (e.g. window or siding replacement)
 - f. ___ Other (Please List): _____
11. How much do you anticipate on spending for these house repairs and improvements?
- a. None
 - b. Under \$1,000
 - c. \$1,000 - \$5,000
 - d. \$5,001 – \$10,000
 - e. Over \$10,000
12. Within the last three years, have you tried obtaining financing to pay for repairs or improvements?
- a. Yes
 - i. If Yes, were you successful in acquiring a loan?
 - 1. Yes
 - 2. No
 - b. No

ALL Respondents

1. What is your age?
- a. Under 18
 - b. 18-24
 - c. 25-34
 - d. 35-44
 - e. 45-54
 - f. 55-64
 - g. 65+
2. Please provide your zip code:
- a. 92025
 - b. 92026
 - c. 92027
 - d. 92029
 - e. 92030
 - f. 92033
 - g. 92046
3. Please rank the following housing challenges in Escondido. Please use each number once. (1 = Biggest problem; 7 = Not a problem)
- a. ___ High Housing Cost
 - b. ___ Supply of New Housing For Sale
 - c. ___ Supply of New Housing to Rent
 - d. ___ Housing Condition and Property Maintenance
 - e. ___ Neighborhood Physical Condition (such as streetlights, sidewalks, etc.)
 - f. ___ Fair Housing Services
 - g. ___ Other (Please List): _____
4. Please rank the following groups by order of their need for housing and related services in the community. Please use each number once. (1= Greatest Need; 8 = Least Need)
- a. ___ Seniors
 - b. ___ Large Households (five or more members)
 - c. ___ Persons with Disabilities
 - d. ___ Young Adults
 - e. ___ Veterans
 - f. ___ Military Personnel/Military Families
 - g. ___ Former Homeless



- h. Other (Please List): _____
- 5. How adequate is Escondido's supply of the following housing types?
(Yes = Adequate Supply; No = Not Adequate Supply)
 - a. Single family homes
 - b. Townhomes and condominiums
 - c. Rental apartments
 - d. Accessory Dwelling Units (ADU or "Granny Flat")
 - e. Senior housing
 - f. Housing for persons with disabilities
 - g. Housing for the Homeless
 - h. Other (Please List): _____
- 6. What types of housing programs and activities do you feel the City should concentrate on over the next eight years? Please rank by order of importance. Please use each number once. (1 = Most Important; 10 = Least Important)
 - a. Housing Rehabilitation Assistance for Homeowners
 - b. Rental Housing Rehabilitation
 - c. Code Enforcement
 - d. Affordable Housing Development
 - e. First Time Homebuyer Assistance
 - f. Accessible Units for Persons with Disabilities
 - g. Housing for Seniors
 - h. Housing for the Homeless
 - i. Housing Discrimination and Tenant/Landlord Dispute Resolution
 - j. Other (Please List): _____

Thank You!



**We
Need Your
Opinion!**



YOU ARE INVITED TO:
**Community Meeting to Discuss
Housing in the East Valley!**

Escondido is dedicated to creating a sustainable and livable community for all. To achieve this, the City of Escondido is preparing a city-wide housing plan. The City is exploring a strategy to develop more housing in important areas to meet state housing requirements and to meet our own goals for maintaining community character and strong neighborhoods. The East Valley is one of those target areas.

This community meeting will introduce this plan and ask for your input on the future of housing in Escondido and we will talk about key opportunities and constraints for East Valley.

We would like your opinion! Join us to work together and develop strategies that address current and future housing needs.

Meeting Information:

- July 23, 2020
- 6:00 p.m. to 8:00 p.m.
- Online

For more information, please visit: www.Escondido.org/hcis.aspx



For any additional information or questions, please contact Darren Parker at: dparker@escondido.org



¡Necesitamos su opinión!



SE LE INVITA A PARTICIPAR EN:

Una cita comunitaria para hablar de vivienda en el Valle del Este!

Escondido está dedicado de crear una comunidad sostenible y habitable para todos. La ciudad de Escondido está preparando un plan de vivienda para la ciudad entera. La ciudad está explorando una estrategia para tener más viviendas en áreas importantes para cumplir con los requisitos estatales de vivienda, así como nuestros propios objetivos para mantener el carácter de la comunidad y los vecindarios fuertes. El Valle del Este es una de esas áreas.

Esta cita comunitaria sería nuestra oportunidad para presentar el plan y le pedirá su opinión sobre el futuro de la vivienda en Escondido, concentrando en las oportunidades importantes y limitaciones del Valle del Este.

¡Nos gustaría su opinión! Este invitado para esta discusión de las necesidades de vivienda de hoy hasta el futuro.

Información de la cita:

- 📅 July 23, 2020
- 🕒 6:00 p.m. to 8:00 p.m.
- 📍 Online

Para más información, visita: www.Escondido.org/hcis.aspx



Para más información o preguntas, favor de comunicarse con Darren Parker en: dparker@escondido.org



We
Want Your
Opinion!



YOU ARE INVITED TO:
**Community Meeting to Discuss
Housing Alternatives in East Valley!**

Esccondido is dedicated to creating a sustainable and livable community for all. To achieve this, the City of Esccondido is preparing a city-wide housing plan. The City is exploring a strategy to develop more housing in important areas to meet state housing requirements and to meet our own goals for maintaining community character and strong neighborhoods. East Valley is one of those target areas.

This community meeting will discuss three land use alternatives proposed for the East Valley area with a focus on housing. Meeting participants will be asked for their input on the alternatives presented and what aspects they envision and prefer for the future of East Valley.

We would like your opinion! Join us to work together and develop strategies that address current and future housing needs. Sign-up to let us know you'll be attending this workshop. Registration is encouraged but not required: <https://www.esccondido.org/workshop-registration.aspx>.

Meeting Information:

- 📅 October 7, 2020
- 🕒 6:00 p.m.
- 📍 Online

For more information, please visit: www.Esccondido.org/hcis.aspx



For any additional information or questions, please contact Darren Parker at: d.parker@esccondido.org



¡Nosotros
queremos tu
opinión!



ESTAS INVITADO A: ¡Reunión comunitaria para discutir Alternativas de vivienda en East Valley!

Esccondido se dedica a crear una comunidad sostenible y habitable para todos. Para lograr esto, la Ciudad de Esccondido está preparando un plan de vivienda para toda la ciudad. La Ciudad está explorando una estrategia para desarrollar más viviendas en áreas importantes para cumplir con las requisitas de vivienda del estado y cumplir con nuestras propias metas para mantener el carácter de la carácter comunitario y vecindarios sólidos. East Valley es una de esas áreas.

Esta reunión comunitaria discutirá tres alternativas de uso de la tierra propuestas para el área de East Valley con un enfoque en la vivienda. Se pedirá a los participantes de la reunión su opinión sobre las alternativas presentadas y qué aspectos prevén y prefieren para el futuro de East Valley.

¡Nos gustaría tu opinión! Únase a nosotros para trabajar juntos y desarrollar estrategias que aborden las necesidades de viviendas actuales y futuras. Regístrese para informarnos que asistirá a este taller.

Se recomienda registrarse, pero no es obligatorio: <https://www.esccondido.org/workshop-registration.aspx>.

Información de reunión:

- 📅 Octubre 7, 2020
- 🕒 6:00 p.m.
- 📍 Conectado en línea

Para mayor información, por favor visite: www.Esccondido.org/hcis.aspx



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@Esccondido_CA



City of Esccondido



Para cualquier información adicional o preguntas, comuníquese con Darren Parker a darren@esccondido.org



Appendix D: Review of Past Accomplishments

The City worked diligently to address the housing needs of special needs groups. Some of the accomplishments are highlighted below:

- Completed the construction of Veteran’s Village
- Re-established a housing rehabilitation program for mobile homes; many mobile home owners are seniors with limited incomes
- Provided rental subsidies to 30 senior/disabled households in mobile homes and apartments using City funds while they were waiting for HUD Section 8 assistance
- Conducted mobile home park rent hearings to ensure requests for rent increases were reasonable.
- Amended the Zoning Code to permit senior housing by right where housing is permitted

Table D-1 summarizes the City’s accomplishments in implementing the fifth cycle Housing Element.

2013 Housing Element	Objective	Accomplishment	Continued Appropriateness
<p>1.1 Project Development</p> <p>Create an increased supply of affordable housing units for lower income households, including households with extremely low incomes. Every effort will be made to accomplish this through redevelopment and acquisition/rehabilitation.</p>	<p>Increase supply of rental units for extremely low, very low, and low income residents by 300 units.</p>	<p>Within the HE period, the City contracted with Community Housing Works, Interfaith Community Services, and Solutions for Change to develop affordable rental projects consisting of acquisition/rehabilitation of existing units (CHW and Interfaith) and new construction (Solutions). The following projects were completed throughout the planning period:</p> <ul style="list-style-type: none"> ▪ CHW Project: Completed 11 HOME affordable units out of 200 total affordable units in the project in April 2017. ▪ Interfaith Project: Rehabilitated an existing 4-unit project in 2018. ▪ Solutions Project: Completed construction of a new affordable rental project consisting of 33 units (32 affordable) in July 2017. ▪ Veteran’s Village of San Diego: Completed a 54-unit (including 48 units of new construction and 53 total affordable units) development serving homeless veterans in 2019. <p>Including three previous projects during the HE period (11 ownership units by SDHFH in 2015, 35 new rental units by CHW in 2013 and 44 rehabilitated units by UHC in 2015), a total of 147 affordable housing units have been created via local funding since 2013.</p>	<p>This program is included in the 2021 Housing Element.</p>



Table D-1: Review of Past Accomplishments

2013 Housing Element	Objective	Accomplishment	Continued Appropriateness
<p>1.2 Lot Consolidation</p> <p>Encourage consolidation of small lots to utilize land more efficiently and facilitate the development of mixed-use and affordable multi-family developments.</p>	<p>Facilitate development as envisioned in the General Plan.</p>	<p>The City utilizes a ministerial process for basic lot consolidation. The City continues to encourage consolidation of lots to facilitate mixed-use and affordable development (see Program 1.1).</p>	<p>This program is included in the 2021 Housing Element.</p>
<p>1.3 Infill New Construction Support</p> <p>new construction of homeownership and rental units and redevelopment/revitalization on infill sites. The city also encourages recycling and revitalizing of sites for a variety of housing types and income levels.</p>	<p>Create new housing opportunities for homeownership and rental for low and moderate income households.</p>	<p>The majority of the affordable residential projects completed during the period have been on infill sites. The following projects were developed on infill sites during the planning period:</p> <ul style="list-style-type: none"> ▪ Veteran's Village (10 funded units out of 53 affordable): Completed in 2019 on infill land on South Escondido Boulevard. ▪ Solutions for Change affordable rental project (32 out of 33 units affordable): Completed in 2017 on an infill site on South Escondido Boulevard. ▪ Interfaith Community Services Aster Street Rehabilitation project (4 affordable units): Completed in 2018. ▪ CHW rehabilitation project (11 out of 200 units HOME affordable): Completed in 2017 on Midway Drive. ▪ SDHFH Project (11 units): Completed in 2015 on an infill site. ▪ CHW Project (35 units): Completed in 2013 on an infill site. ▪ UHC Project (44 units): Completed in 2015 on an infill site. 	<p>This program is included in the 2021 Housing Element.</p>
<p>1.4 City-Owned Sites</p> <p>Facilitate the redevelopment/development of affordable housing on City-owned sites.</p>	<p>Use City-ownership as a potential inducement for rehabilitation of more affordable housing.</p>	<p>The Housing and Neighborhood Services Division, the Engineering Services Department, the City's Real Property Agent, and other City staff continue to review City-owned properties when they become available as potential sites for redevelopment as affordable housing.</p>	<p>This program is included in the 2021 Housing Element.</p>
<p>1.5 Density Bonus</p> <p>Amend Density Bonus Ordinance to be consistent with State law.</p>	<p>Encourage additional housing opportunities for low and moderate income households.</p>	<p>City staff completed an amendment to the Zoning Code in 2017 to modify Density Bonus provisions so they are in conformance with state law. The City will continue to maintain consistency with State density bonus law, including amending the Zoning Code as necessary. Several projects are currently in the pipeline or have been recently</p>	<p>The Zoning Code was amended in compliance with State law. A modified version of this Program will be included in the</p>



Table D-1: Review of Past Accomplishments

2013 Housing Element	Objective	Accomplishment	Continued Appropriateness
		completed using Density Bonus provisions, providing additional affordable units.	Housing Element Update.
<p>2.1 Housing Rehabilitation – Renter Occupied</p> <p>Continue to explore potential rental rehabilitation programs.</p>	<p>Increase opportunities for rental rehabilitation for lower income households (25 units).</p>	<p>Funding from a CalHOME grant allowed the City to re-establish an owner-occupied rehabilitation program for low-income households in single-family residences and mobile homes in 2015. The program ended in 2017. City staff continues to explore funding opportunities for a new renter-occupied rehabilitation program.</p>	<p>This program is included in the 2021 Housing Element.</p>
<p>2.2 Acquisition/ Rehabilitation</p> <p>Continue to explore ways to encourage the recycling of deteriorated and older structures for affordable housing opportunities.</p>	<p>Increase affordable housing opportunities for lower income households (200 units).</p>	<p>Recycling of existing, dilapidated structures continues to be a priority in Escondido. An RFP in 2014 for affordable housing developers resulted in the following affordable rehabilitation developments:</p> <ul style="list-style-type: none"> ▪ 11 acquisition/rehabilitation units in a 200-unit development completed in 2017, ▪ 44-unit rehabilitation project completed in 2015. <p>An RFP in 2017 resulted in a 4-unit affordable rehabilitation project completed in 2018.</p>	<p>This program is included in the 2021 Housing Element.</p>
<p>2.3 Focus on Neighborhoods</p> <p>Collaborate with departments to channel resources and efforts into improvement of neighborhood quality of life, including code enforcement, housing rehabilitation and capital improvements.</p>	<p>Increase the concentration of City resources to individual neighborhoods and the opportunity for significant community impact both in physical improvement and improvement in quality of life for neighborhood residents. Continue collaboration efforts through funding resources, policies and community outreach.</p>	<p>In 2019, there were 18 recognized neighborhood groups in the City. Project NEAT continues to utilize Community Development Block Grant (“CDBG”) funding to assist residents in solving their own neighborhood problems at a neighborhood (rather than a Code Enforcement) level, such as maintenance, graffiti, trash. The Neighborhood Transformation Project (“NTP”) is one effort to join neighborhoods with City Departments to combine resources (funding and sweat equity) in targeted areas to include neighborhood cleanups and public improvements. The City continues a focused approach in neighborhoods using additional strategies to improve neighborhoods by involving residents.</p>	<p>This program is included in the 2021 Housing Element</p>



Table D-1: Review of Past Accomplishments

2013 Housing Element	Objective	Accomplishment	Continued Appropriateness
<p>2.4 Preservation of At-Risk Housing</p> <p>Continue to explore means to continue housing affordability for lower income households that would be impacted by the conversion of subsidized projects to market rate housing.</p>	<p>Continue affordability of subsidized housing developments. If owner wishes to sell, contact potential buyers who would want to extend affordability, and if unsuccessful, follow up with Section 8 and relocation potential.</p>	<p>The City continues to monitor at-risk units, particularly those identified in the Housing Element. This effort is ongoing. The City worked with Community HousingWorks to preserve the affordability of 200 units in Cypress Cove (now Manzanita Apartments) while extending affordability of 11 of the units using HOME funds in 2017. In 2018-2019 the City helped preserve 6 affordable, transitional units at 1203 South Maple Street (Las Casitas) by committing CHDO funds for rehabilitation of the project. Community HousingWorks is approximately 9 years into the affordability period on an acquisition/rehab project and is preserving affordability by rehabilitating a number of structural problems not addressed originally (roof, termites, rot). No at-risk units were lost in 2017, 2018 or 2019.</p>	<p>This program is included in the 2021 Housing Element.</p>
<p>3.1 First-Time Homebuyer/Home Entry Loan Program ("HELP")</p> <p>Provide low interest loans to lower income households for closing costs and down payment, of lesser of 5% of purchase price or \$25,000, using federal HOME funds.</p>	<p>Increase homeownership opportunities for lower income households (150 households).</p>	<p>In December 2017 Housing and Neighborhood Services staff met with local real estate professionals to discuss possible impediments to issuing First-time homebuyer loans and possible solutions. The City continues to try to improve the success of the loan program. No HELP loans were funded during 2016, 2017, 2018 or 2019. 4 loans were funded during 2015, 2 during 2014 and 3 during 2013, for a total of 9 first-time homebuyer loans during the period.</p>	<p>This program is included in the 2021 Housing Element.</p>
<p>3.2 First-Time Homebuyer /Mortgage Credit Certificates</p> <p>Provide mortgage credit certificates to first-time homebuyers to reduce federal income taxes and more easily qualify for a loan..</p>	<p>Increase homeownership opportunities for low and moderate income households (20 households).</p>	<p>Although MCCs remain available to Escondido residents, a local MCC administrator no longer exists and MCCs are not reported locally after 2014.</p>	<p>This program is included in the 2021 Housing Element.</p>
<p>3.3 Rental Subsidy</p> <p>Provide households with affordable rents through rent subsidy programs for households with incomes not exceeding</p>	<p>Provide rental subsidy to 110 very low-income senior/disabled households in mobile home</p>	<p>During 2019, 1,040 Escondido households were assisted with a Housing Choice Voucher (Section 8 voucher), administered through the Housing Authority of San Diego County. An additional 2,032 households are on the wait list in Escondido. At the end of 2019, 23 senior/disabled households in mobile home parks and an</p>	<p>This program is included in the 2021 Housing Element.</p>



Table D-1: Review of Past Accomplishments

2013 Housing Element	Objective	Accomplishment	Continued Appropriateness
50% of the Area Median Income.	parks and apartments. Support Rental Assist 1,200 very-low income households with Housing Choice Vouchers through collaboration with Housing Authority of San Diego County.	additional 7 in apartments, for a total of 30, were receiving a monthly rental subsidy from the City of Escondido while waiting for HUD Section 8 eligibility. Eligibility for the Rental Subsidy Program was tightened in 2012 due to the loss of redevelopment funds and the number of monthly subsidies has slowly declined.	
3.4 Mobile Home Park Conversion Provide technical assistance to mobile home resident groups in the conversion of existing parks to resident ownership.	Continue mobile home resident ownership opportunities for lower income residents. Continue to work with City policies and procedures to assist in conversions.	The City continues to provide technical assistance to mobile home parks considering conversions to resident ownership. No recent conversions have been requested. The City has been advised on the purchase of an existing mobile homes park and the potential change of use, although the owner is not currently moving forward. The City continues to manage the remaining City-owned spaces in Escondido Views (4 lots) and Mountain Shadows (22 lots) mobile home parks.	This program is included in the 2021 Housing Element.
3.5 Mobile Home Rent Review Rent review via the Rent Review Board of applications for increases in mobile home parks.	Stabilize rents for mobile home residents, many of whom are lower income.	During 2019, 5 short-form rent review hearings and no long-form rent review hearings were held. Average monthly increases approved for short form applications ranged from \$9.88 to \$18.41. Throughout the planning period (2015-2019), a total of 39 short-form rent review hearings and one long-form rent review hearings were held.	This program is included in the 2021 Housing Element.
3.6 Fair Housing Actively engage in furthering fair housing for all residents through specific education outreach and monitoring activities.	Continue enforcement of the Fair Housing Plan which will prevent discrimination in housing and disputes between landlords and tenants.	In 2019 the City contracted with the Legal Aid Society of San Diego, Inc. to provide Fair Housing Services to Escondido residents, including handling reports of discrimination, and providing counseling and mediation in landlord/tenant disputes. City staff continues to disperse information at public counters, review potential impediments to fair housing, and meet with other jurisdictions to discuss and address regional issues. The City of Escondido has been working collaboratively with other jurisdictions in the San Diego County region to address Fair Housing reporting in compliance with HUD's current requirements.	This program is included in the 2021 Housing Element.



Table D-1: Review of Past Accomplishments

2013 Housing Element	Objective	Accomplishment	Continued Appropriateness
<p>4.1 Emergency Shelters</p> <p>Amend the Zoning Code to permit emergency shelters by right, consistent with State law.</p>	<p>Ensure Zoning Code is consistent with state law. Provide of shelter for families</p> <p>/individuals with special needs.</p>	<p>The City's Emergency Shelter Overlay, in compliance with State law, was approved by the City Council in October 2013. Staff re-evaluated the size and location of the Overlay in 2015, but left the language unchanged. The City is in compliance with State law. A year round shelter operated by Interfaith Community Services currently operates outside the Overlay area.</p>	<p>This program is completed.</p>
<p>4.2 Transitional/ Supportive Housing</p> <p>Amend the zoning code to differentiate transitional/supportive housing operated as group quarters versus a regular housing development. Uses will be permitted where housing is otherwise permitted.</p>	<p>Increase housing opportunities for special needs persons.</p>	<p>An amendment to the Zoning Code to define transitional and supportive housing as specified in State law, and to permit both where residential units are otherwise permitted, was completed in June 2017.</p>	<p>The Zoning Code amendment was completed during this planning period. A modified version of this program is included in the 2021 Housing Element.</p>
<p>4.3 Senior Housing Ordinance</p> <p>Amend the Zoning Code to permit senior housing by right where housing is permitted.</p>	<p>Increase housing opportunities for seniors.</p>	<p>An amendment to the Zoning Code to permit senior housing by right where housing is permitted, was completed in June 2017.</p>	<p>The Zoning Code amendment was completed during this planning period.</p>
<p>4.4 Monitoring of Growth Management Measure</p> <p>Periodically monitor and evaluate Proposition S for its impacts on the cost, supply and timing of affordable housing. Analyze the ability to accommodate the city's regional housing need, constraints on supply and affordability of housing.</p>	<p>Increase public awareness of the City's housing needs and obligations under state law.</p>	<p>The City's Housing Element shows that the City's RHNA can be accommodated. In 2018 it does not appear that the existence of Proposition "S" discouraged or prevented construction of market or affordable units. The City will continue to monitor RHNA progress annually to determine whether growth management policies impact the City's ability to accommodate its affordable housing need.</p>	<p>This program is included in the 2021 Housing Element</p>
<p>5.1 Affordable Housing Financing</p>	<p>Acquisition, rehabilitation, preservation or</p>	<p>Staff continues to pursue all available opportunities to utilize additional funding sources for potential projects and programs, including tax</p>	<p>This program is included in the 2021 Housing Element</p>



Table D-1: Review of Past Accomplishments

2013 Housing Element	Objective	Accomplishment	Continued Appropriateness
Continue to pursue a variety of funding sources to support affordable housing in the community.	construction of affordable housing for lower and moderate income households.	credits, grants and collaboration with non-profit providers.	
<p>5.2 Housing Information and Referral</p> <p>Update public information in many formats identifying the City's housing programs and provide opportunities to market those programs.</p>	Create more effective and targeted housing programs, especially for lower income households.	<p>Housing program and project information is updated as needed and is distributed via a variety of avenues, such as the City website, brochures, mailers and referral cards, and at the senior center and City Hall. Staff continues to seek additional ways to distribute information to the public. The City website was most recently overhauled at the beginning of 2018, resulting in an easier to read and use source of housing, fair housing and other information for the public. Updates to the website are ongoing as needed. In 2019, the City established the Communications and Community Services Department, which includes a Communications Officer who disseminates information through various media sources. This results in a broader reach of program information.</p>	The City's website is updated periodically as a routine practice. This is removed from the Housing Element as a specific program.

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Appendix E: Affirmatively Furthering Fair Housing

In January 2017, Assembly Bill 686 (AB 686) introduced an obligation to affirmatively further fair housing ("AFFH") into California state law. AB 686 defined "affirmatively further fair housing" to mean "taking meaningful actions, in addition to combat discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity" for persons of color, persons with disabilities, and other protected classes. The Bill added an assessment of fair housing to the Housing Element which includes the following components: a summary of fair housing issues and assessment of the City's fair housing enforcement and outreach capacity; an analysis of segregation patterns and disparities in access to opportunities, an assessment of contributing factors, and an identification of fair housing goals and actions.

A. Assessment of Fair Housing Issues

Fair Housing Enforcement and Outreach

The City of Escondido is committed to furthering fair housing efforts by promoting fair and equal housing opportunities for its residents. It has committed to highlighting the Fair Housing Law, Title VIII of the Civil Rights Act of 1968 and the California Fair Employment and Housing Act (FEHA), by continuing to address discrimination in the community and to support programs that will educate the public about the right to equal housing opportunities.

The City of Escondido provides fair housing services to its residents through Legal Aid Society San Diego (LASSD). LASSD, a fair housing provider, is contracted annually with CDBG funds as part of the City's Fair Housing Program. LASSD provides fair housing services to guarantee equal housing opportunity to Escondido residents. The LASSD provides the following fair housing related services:

- Tenant-Landlord mediation
- Fair housing counseling and dispute mediation
- Educational fair housing seminars for tenants and landlords (English and Spanish and other languages upon request)
- Services to tenants, landlords and apartment managers
- Real estate and rental practice discrimination audits
- Legal services and advocacy
- Enforcement of fair housing laws through conciliation, litigation, or administration referrals.



Walk-in services are offered at three LASSD office locations in San Diego County- Southeast, Midtown, and North County. However, these offices are located in the City of San Diego and Oceanside. For this reason, LASSD has established a Fair Housing Hotline to ensure its Fair Housing services are readily available to the community and that a resident may promptly report any act of housing discrimination that may have occurred.

Between FY 2014 and FY 2020, LASSD served 861 Escondido residents, accounting for 4% of LASSD's clients served across San Diego County. LASSD filed 156 fair housing complaints by Escondido residents, accounting for about 8.5% of the cases filed by LASSD for the entire County. LASSD also provided the results of Fair Housing Tests during this period in the 2020 Regional Analysis of Impediments to Fair Housing Choice (2020 Regional AI). Escondido tested for discrimination based on disability, familial status, sexual orientation, and race at 53 sites and showed disparate treatment (discrimination) at eight sites (15% of sites). Five sites showed unequal treatment when testing for disability (reasonable accommodation) and three showed unequal treatment on the basis of sexual orientation. The rate of differential treatment testing results in Escondido is similar to the County trend. Of the 465 test sites across San Diego County, 55 (12%) showed disparate treatment.

The U.S. Department of Housing and Urban Development ("HUD") also maintains a record of all housing discrimination complaints filed in local jurisdictions. These grievances can be filed on the basis of race, color, national origin, sex, disability, religion, familial status and retaliation. From October 1, 2014 to September 30, 2018, 13 fair housing complaints in Escondido were filed with HUD, accounting for 3% of cases in the County. Overall, disability-related discrimination was the most commonly reported—reported in nine cases (70% of cases). Complaints concerning national origin (one complaint), race (three complaints), and retaliation (two complaints) were also reported. During the same time period, a total of 414 cases were filed across San Diego County. Like in Escondido, disability was the basis for discrimination in over half of the cases (281 cases).

The 2020 Regional AI found that enforcement services were inadequate in the region. However, between 2014-2020, 53 sites in Escondido were tested for discrimination, The City will work with LASSD to ensure continued consistent testing. The 2020 Regional AI also found that outreach services were also inadequate in the region as residents may find it hard to navigate the service system and identify the appropriate agency to contact. The City of Escondido has a dedicated fair housing page in the City website (<https://www.escondido.org/fair-housing.aspx>). The fair housing webpage advertises upcoming fair housing workshops and hosts LASSD fair housing informational brochures posted in English, Spanish, and Arabic.



Fair Housing Issue

Discrimination and limited outreach capacity. Disability is the most commonly reported basis discrimination in Escondido and the County. Housing & Neighborhood Services posts information about the fair housing provider and meetings on a dedicated page in their website and works with the Communications Dept to add information to the weekly manager's report/email blasts and City-wide newsletters. However, additional avenues of outreach may be necessary to reach the groups that may not be as connected digitally.

Contributing factors:

- Private discrimination
- Lack of education and enforcement of fair housing laws
- Limited media marketing
- Meetings in same sites/same times

Segregation and Integration

Race and Ethnicity

Ethnic and racial composition of a region is useful in analyzing housing demand and any related fair housing concerns, as it tends to demonstrate a relationship with other characteristics such as household size, locational preferences and mobility. Dissimilarity indices can be used to measure the extent to which a distribution of any two groups differs across block groups. Racial and ethnic dissimilarity trends for Escondido and San Diego-Carlsbad Region are shown in Table E-61. The following shows how HUD views various levels of the index:

- <40: Low Segregation
- 40-54: Moderate Segregation
- >55: High Segregation

From 1990 to 2020, block groups in Escondido have become increasingly segregated. Non-white and White residents have the highest dissimilarity indices, indicating a high degree of segregation between Whites and minority races. Hispanic segregation from Whites scored as "moderate segregation" and had the highest score between race/ethnic comparisons.

Nevertheless, Escondido showed a lower extent of segregation in comparison to the San Diego-Carlsbad region as a whole where the dissimilarity indices for Non-White/White, Black/White, Hispanic/White, and Asian or Pacific Islander/White were all categorized as moderately segregated (compared to only Hispanic/Whites being considered moderately segregated in Escondido).



Table E-61: Racial/Ethnic Dissimilarity Index

	1990 Trend	2000 Trend	2010 Trend	Current
Escondido				
Non-White/White	30.7	36.5	35.2	38.4
Black/White	23.5	27.1	27.2	34.1
Hispanic/White	35.0	42.0	40.2	42.7
Asian or Pacific Islander/White	15.9	12.3	12.7	19.3
San Diego County				
Non-White/White	43.4	45.2	42.9	46.4
Black/White	58.0	53.8	48.4	54.1
Hispanic/White	45.2	50.6	49.6	51.7
Asian or Pacific Islander/White	48.1	46.8	44.4	49.8

Source: HUD Dissimilarity Index, 2020,

The 2020 Regional Analysis of Impediments to Fair Housing Choice used a minority population metric to show the integration and segregation of races. The 2020 AI defined block groups with a proportion of minority households that is greater than the overall San Diego County minority average of 54.2% as areas of minority concentration.



Figure E-7 shows that the highest concentration of minorities in Escondido is found in the center of the City. Most of the block groups on the outskirts of the City have minority concentrations below 54.2%.

HCD's AFFH mapping tool also provides data predominant populations by race by tract. These metrics show tracts where races are the majority and the gaps in proportion between tracts. In Escondido, only non-Hispanic White and Hispanic populations were predominant certain tracts of the City (Figure E-8). Hispanic population is predominant in the center of the City, while White population is predominant in the outskirts. The predominantly Hispanic population is located in the urban downtown area of the City, which is also part of District 1.

Historically, minority populations have been found in the center of the City but have expanded in the last 25 years. According to the National Latino Research Center⁹, the City refers to the Hispanic community bordered by Lincoln Avenue to the north, Ash Street to the east, Valley Parkway to the south and Centre City Parkway to the west in the center of the city as the Mission Park community. The Urban Displacement projects mapping tool in Figure E-9 show the expansion of majority Hispanic population in the center to the east, as well as a diversification of population in the tracts in adjacent to the majority Hispanic tracts, changing from majority non-Hispanic White to no majority.

⁹ "Mission Park Community Survey Escondido, California." Survey Report prepared by National Latino Research Center and California State University, San Marcos. June 2006.



Figure E-7: Areas of Minority Concentration in Escondido (2018)

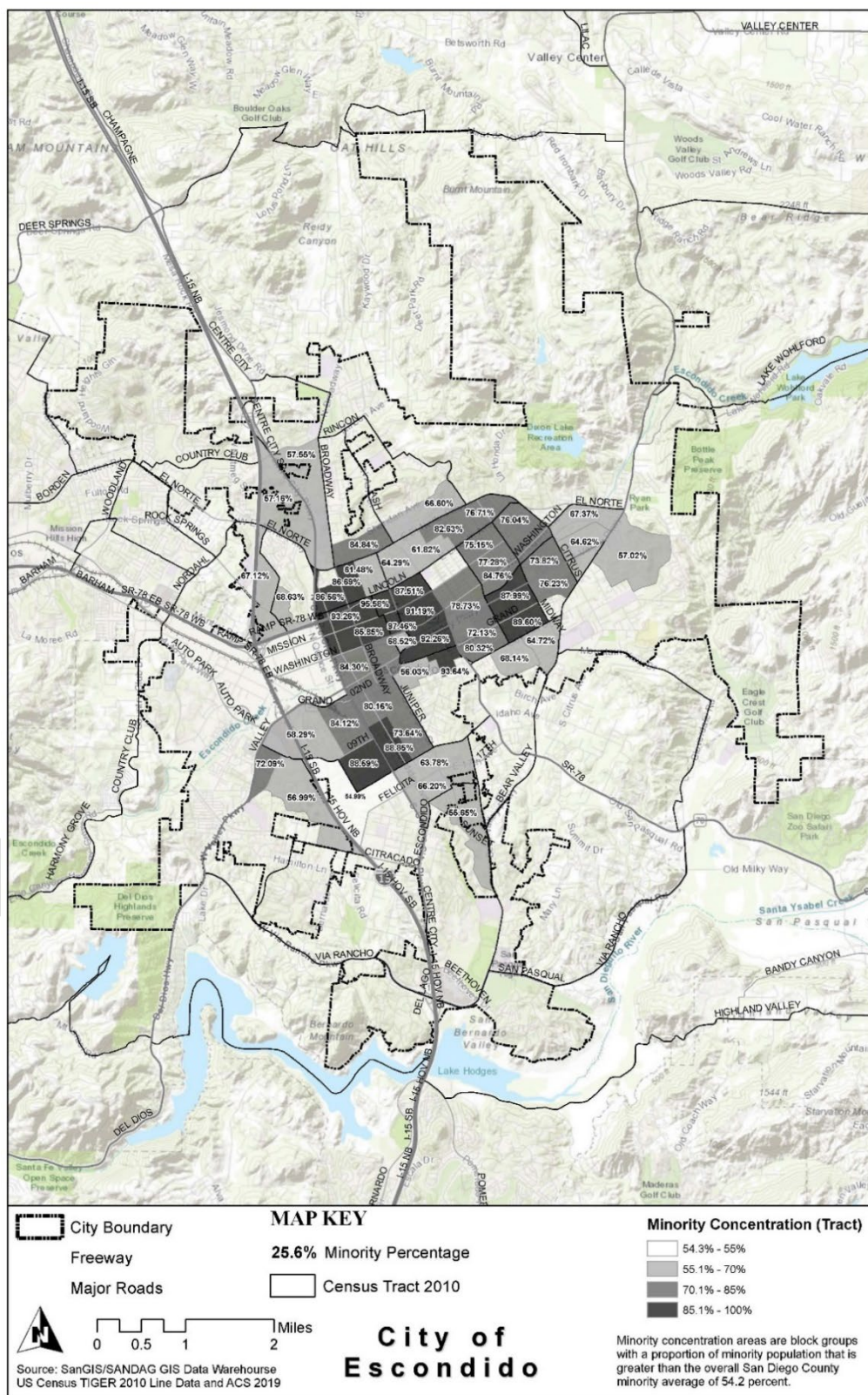




Figure E-8: Predominant Populations- White and Hispanic Majorities

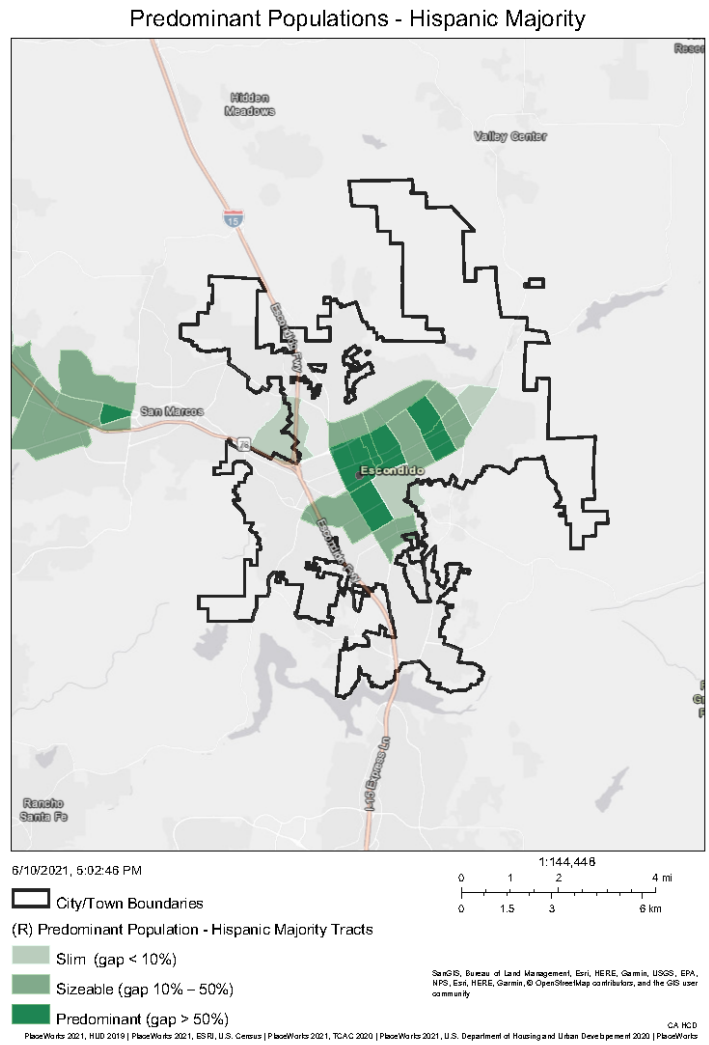
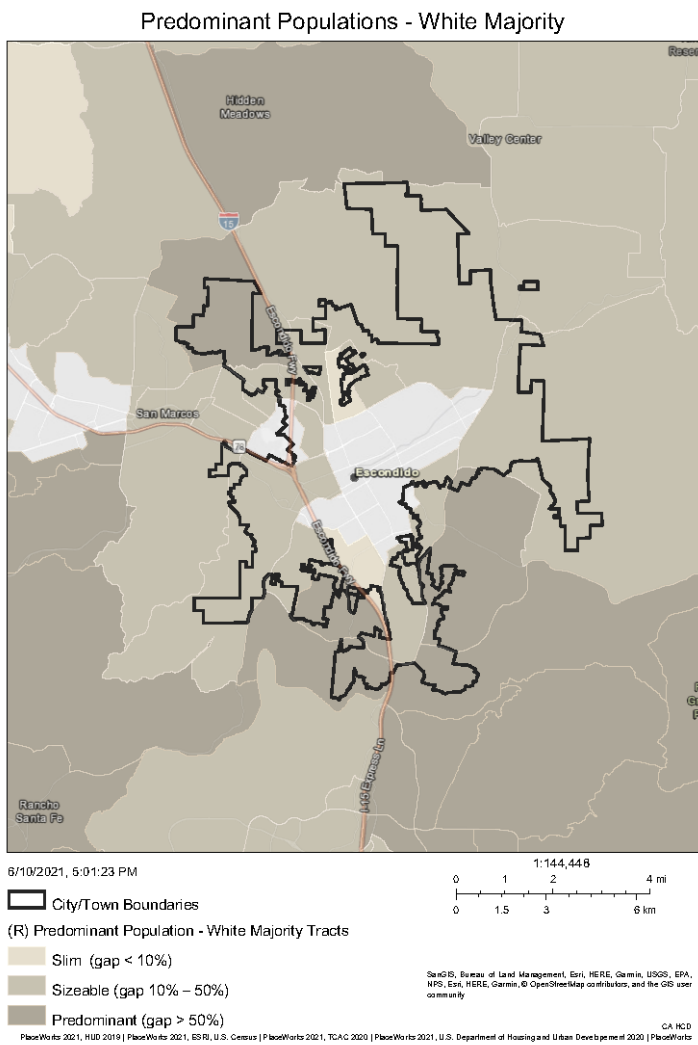
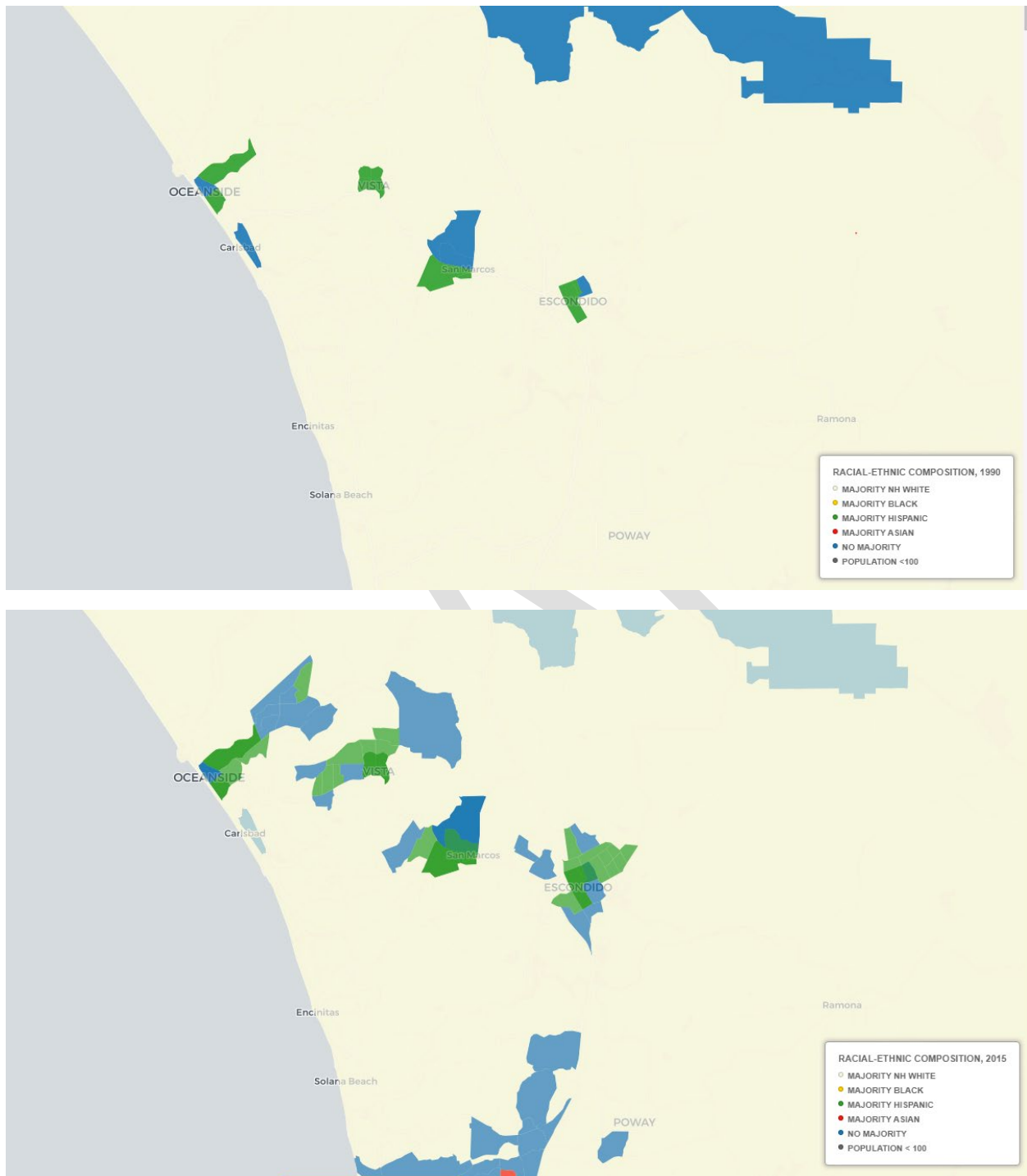




Figure E-9: Change in Racial Composition, 1990-2015



Source: Urban Displacement Project, <https://www.urbandisplacement.org/map/socal#>



Persons with Disabilities

According to the 2020 Regional AI, housing choices for special needs groups, especially persons with disabilities, are limited in the region. In San Diego County, about 10% of the population has a disability. Escondido has a population of persons with disabilities comparable to the County (10.5) but higher than its neighboring cities of San Marcos (8%), Vista (7.6%), and Poway (10%).

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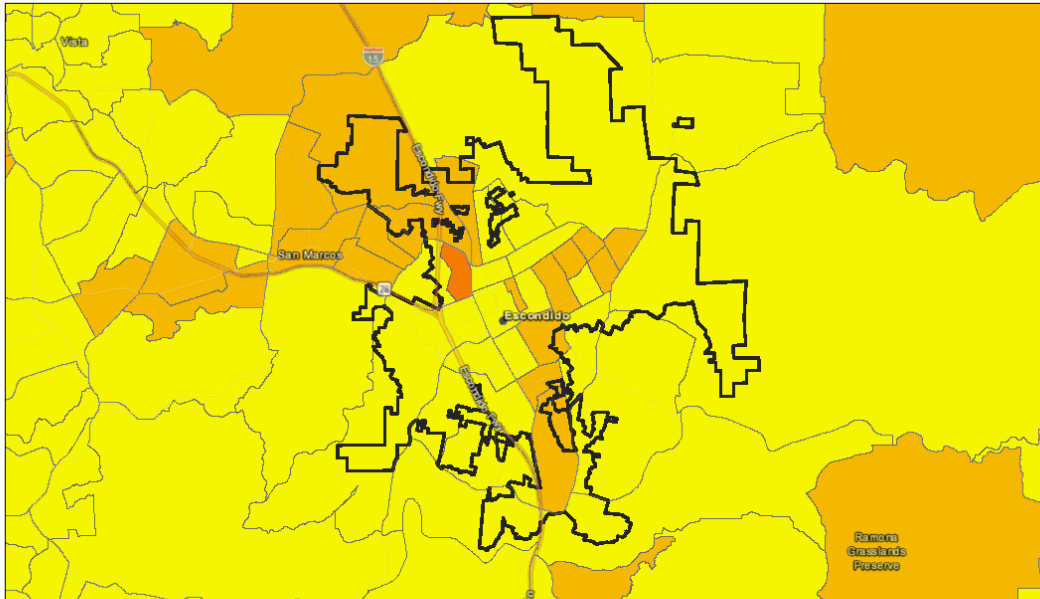
Figure E-10 shows that in the North County region, San Marcos, Oceanside, Carlsbad, and Hidden Meadows have the highest concentration of persons with disabilities, with the population with a disability ranging between 10 and 20% per tract. Within Escondido, tracts in the northwestern and southeastern areas of the City have the highest concentration of persons with disabilities.

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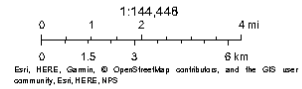
Figure E-10: Distribution of Persons with Disabilities

Persons with Disabilities 2014-2019_Escondido



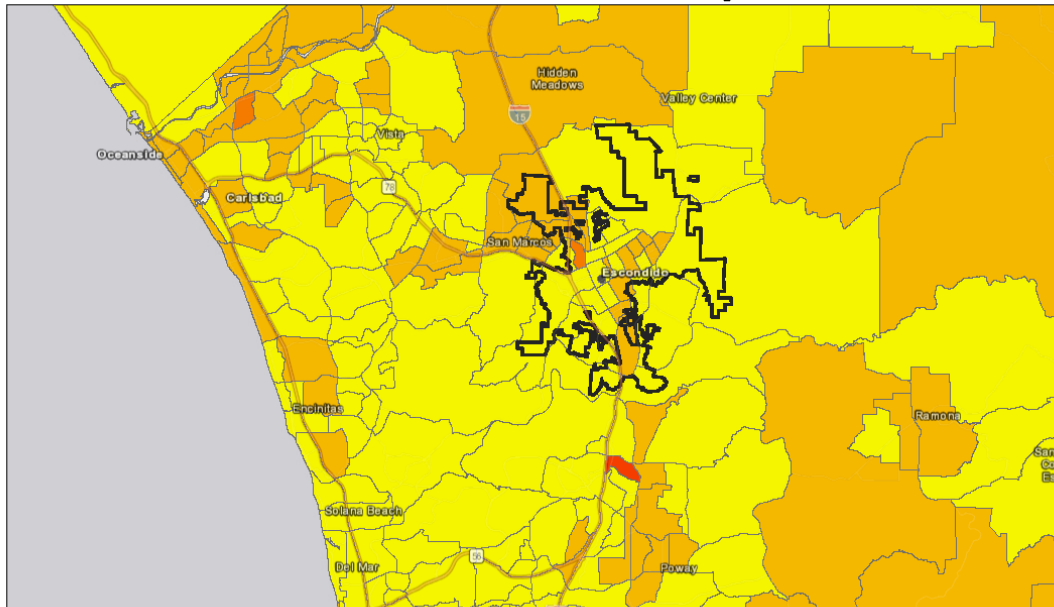
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- City/Town Boundaries
- (R) Population with a Disability (ACS, 2015 - 2019) - Tract < 10%
- 10% - 20%
- 20% - 30%



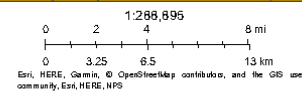
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Persons with Disabilities 2014-2019_Region



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- City/Town Boundaries
- (R) Population with a Disability (ACS, 2015 - 2019) - Tract < 10%
- 10% - 20%
- 20% - 30%
- 30% - 40%



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 Esri, HERE, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S. Department of Housing and Urban Development 2020 | Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community |



Familial Status

Familial status refers to the presence of children under the age of 18, whether the child is biologically related to the head of household, and the marital status of the head of households. According to the AFFH data tool (

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Figure E-11), there is a tract with a high concentration of population of adults living alone in the City, which is the same tract with 20-30% of population with a disability. Adults living with their spouse are concentrated outside tracts of the City, where the population of adults living with their spouse over 40%, compared to the 20 to 40% in the center tracts in the City (Figure E-12).

Families with children may face housing discrimination by landlords who fear that children will cause property damage. Some landlords may have cultural biases against children of the opposite sex sharing a bedroom. Differential treatments such as limiting the number of children in a complex or confining children to a specific location are also fair housing concerns. Single parent households are also protected by fair housing law. The 2020 AI reported that 36 percent of Escondido households were families with children, and 7.6% of households were single-female-headed households with children. The proportion of single female-headed households with children is higher than the neighboring cities of San Marcos (5.7%), Vista (7.2%), and Poway (4.6%), and the County overall (6%). According to the HCD AFFH map in Figure E-13, children in married households are most concentrated in the outside tracts of the City and are most concentrated along the City limits. The percent of children in married households in these tract ranges between 60 and over 80%. By contrast, children in single female-headed households are concentrated in the center of the City (Figure E-14). Female-headed households with children require special consideration and assistance because of their greater need for affordable housing and accessible day care, health care, and other supportive services.



Figure E-11: Percent Population of Adults Living Alone

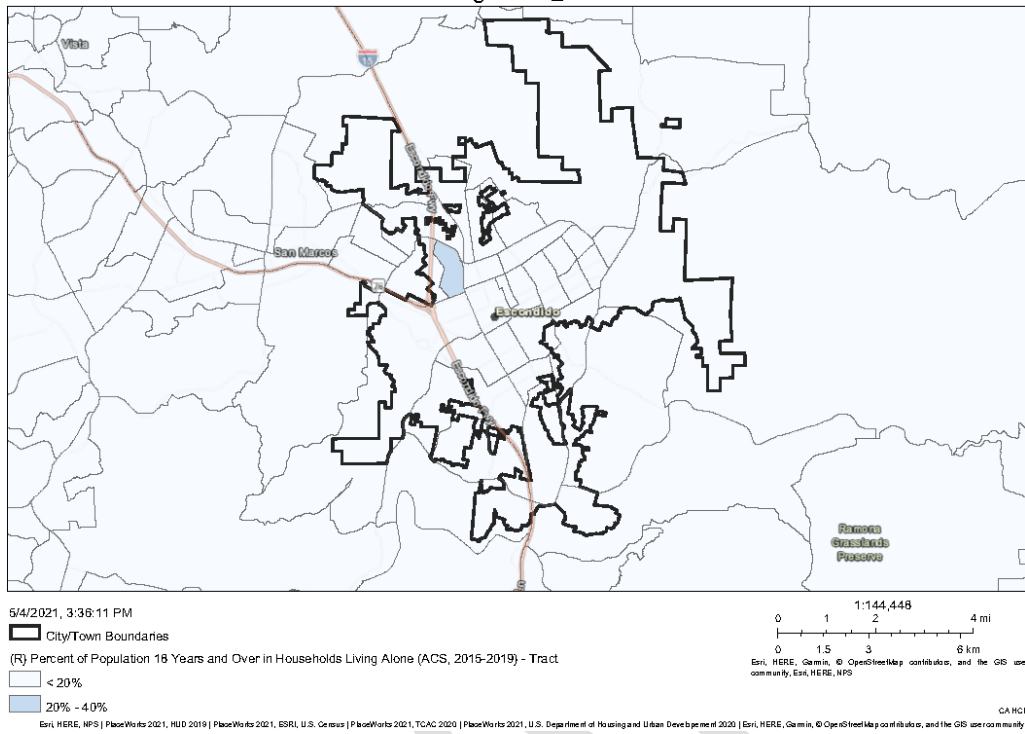


Figure E-12: Percent Population of Adults Living with Spouse

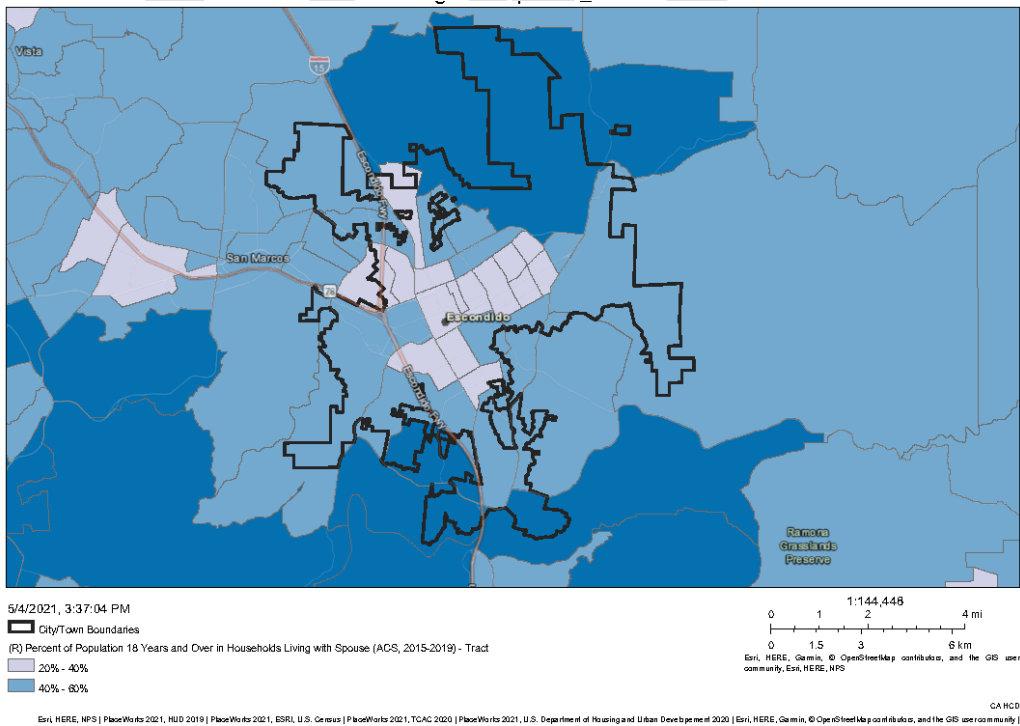
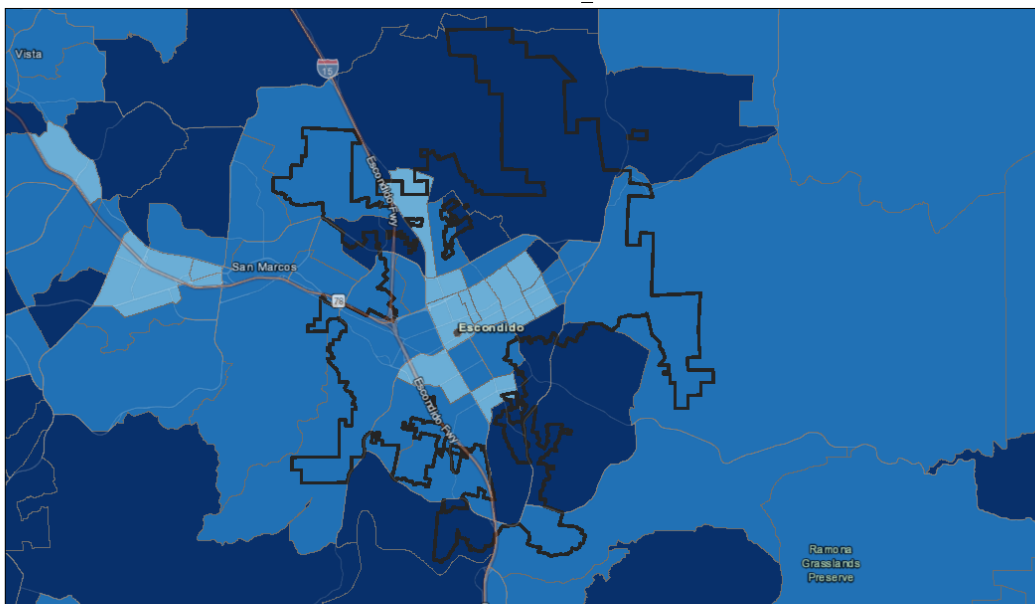




Figure E-13: Percent Children in Married Households

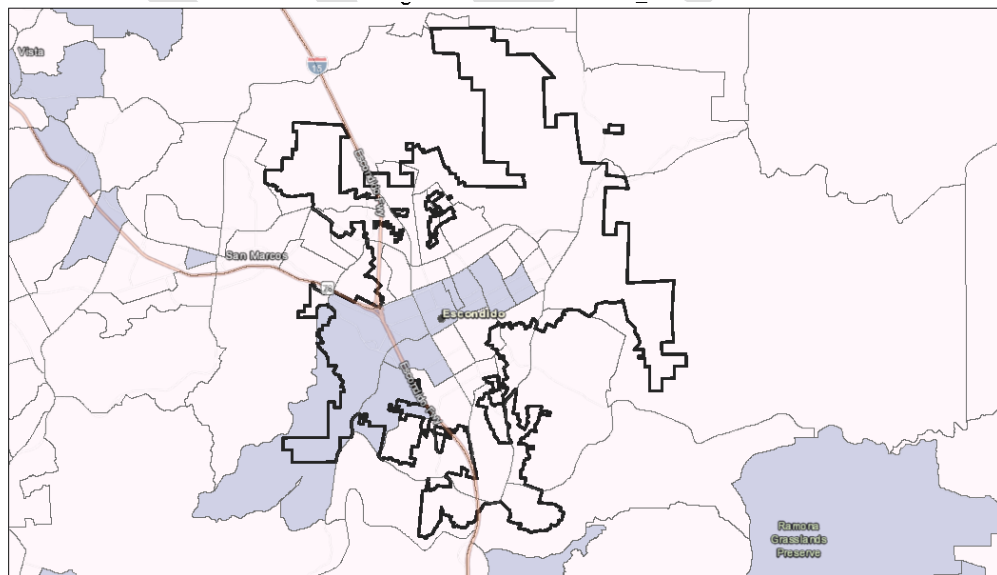


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 City/Town Boundaries
 (R) Percent of Children in Married - Couple Households (ACS, 2015-2019) - Tract
 40% - 60%
 60% - 80%
 > 80%

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 0 1 2 4 mi
 0 1.5 3 6 km
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CA HCD
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Figure E-14: Percent Children in Single Female-Headed Households



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 City/Town Boundaries
 (R) Percent of Children in Female Householder, No Spouse/Partner Present Households (ACS, 2015-2019) - Tract
 ≤ 20%
 20% - 40%

1:144,448
 0 1 2 4 mi
 0 1.5 3 6 km
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CA HCD
 Esri, HERE, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S. Department of Housing and Urban Development 2020 | Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community |



Income Level

Identifying low or moderate income (LMI) geographies and individuals is important to overcome patterns of segregation. Figure E-15 shows the Lower and Moderate Income (LMI) areas in the County by Census block group. HUD defines a LMI area as a Census tract or block group where over 51% of the population is LMI (based on HUD income definition of up to 80% of the AMI). LMI areas are concentrated in three very general areas in the County. In the North County area, LMI areas are seen at Camp Pendleton and in the cities of Oceanside, Vista, San Marcos, and Escondido, in a pattern generally following State Route 78. In the southern portion of the County, cluster of LMI areas are seen in the central and southern areas of the City of San Diego and continuing down to the U.S./Mexico border, including the City of Imperial Beach. The City of Escondido has a variety of population income distribution (Figure E-16). The census tracts in the center of the City have the highest concentration of LMI population (from 50 to up to 100%). The census tracts on the outskirts of town have lower concentration of LMI population.

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Figure E-15: Low and Moderate Income (LMI) Areas in the County

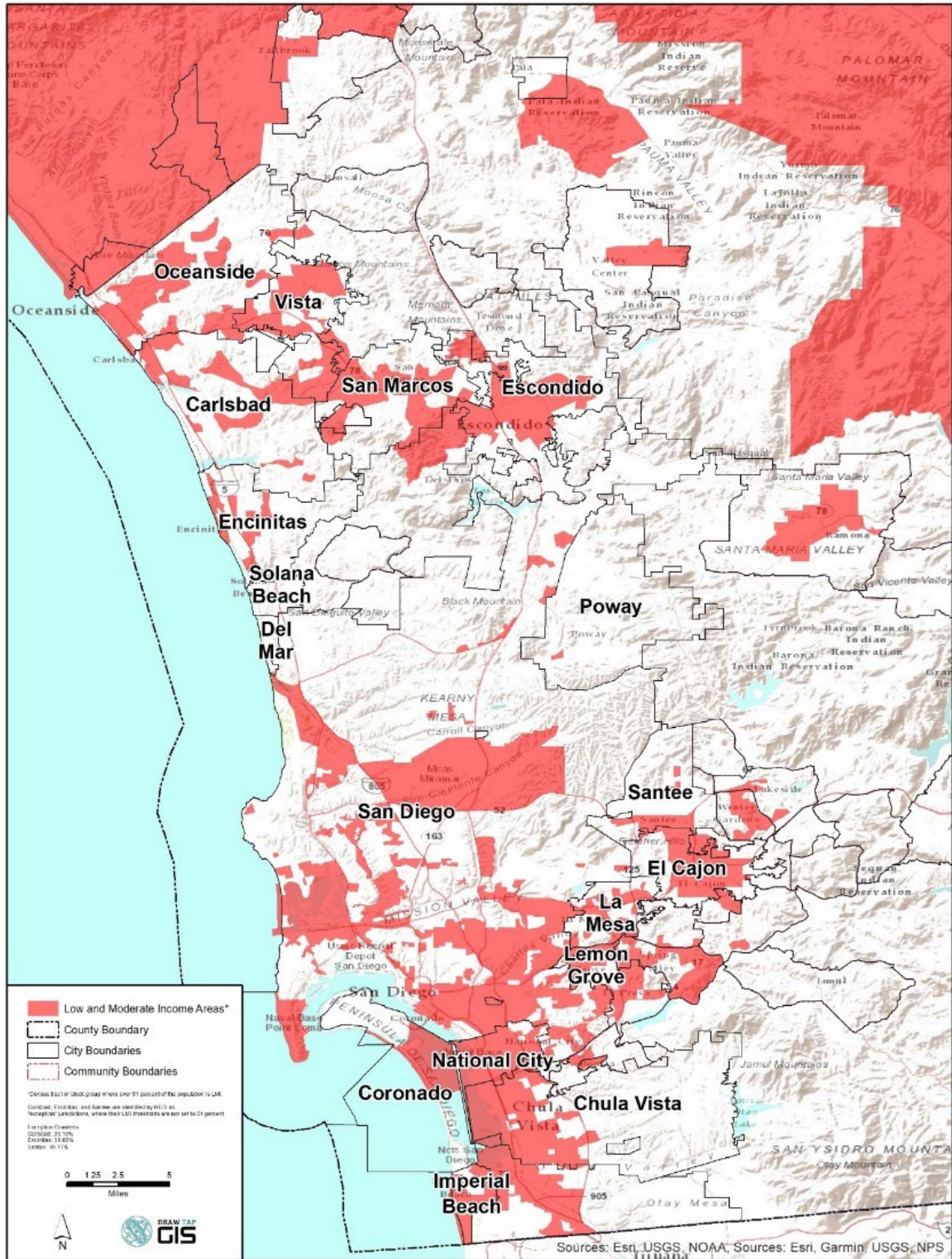
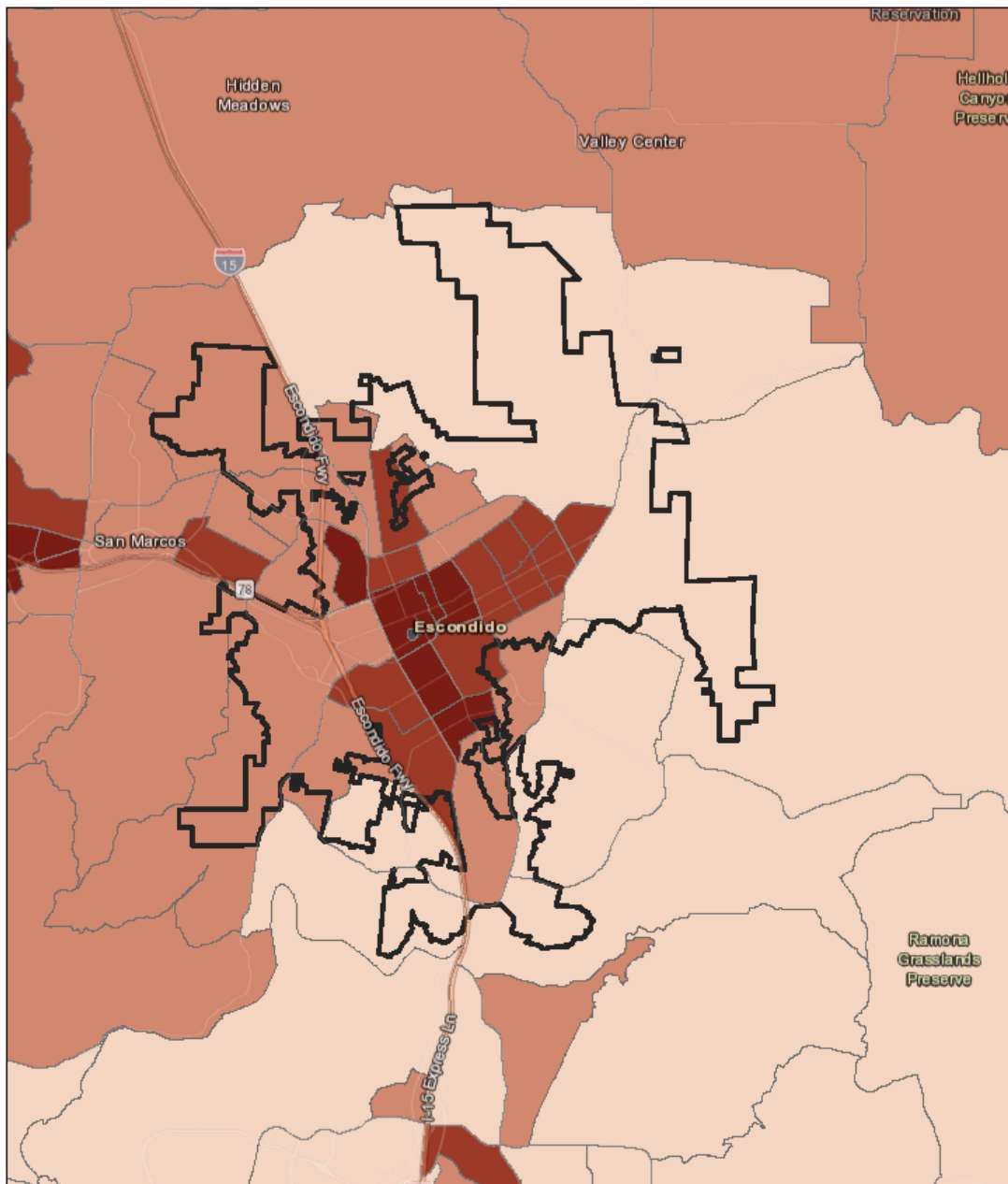




Figure E-16: Low and Moderate Income (LMI) Areas in Escondido

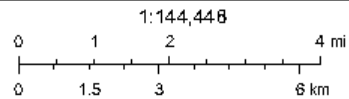


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City/Town Boundaries

(A) Low to Moderate Income Population (HUD) - Tract

- < 25%
- 25% - 50%
- 50% - 75%
- 75% - 100%



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CA HCD
Esri, HERE, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S. Department of Housing and Urban Development



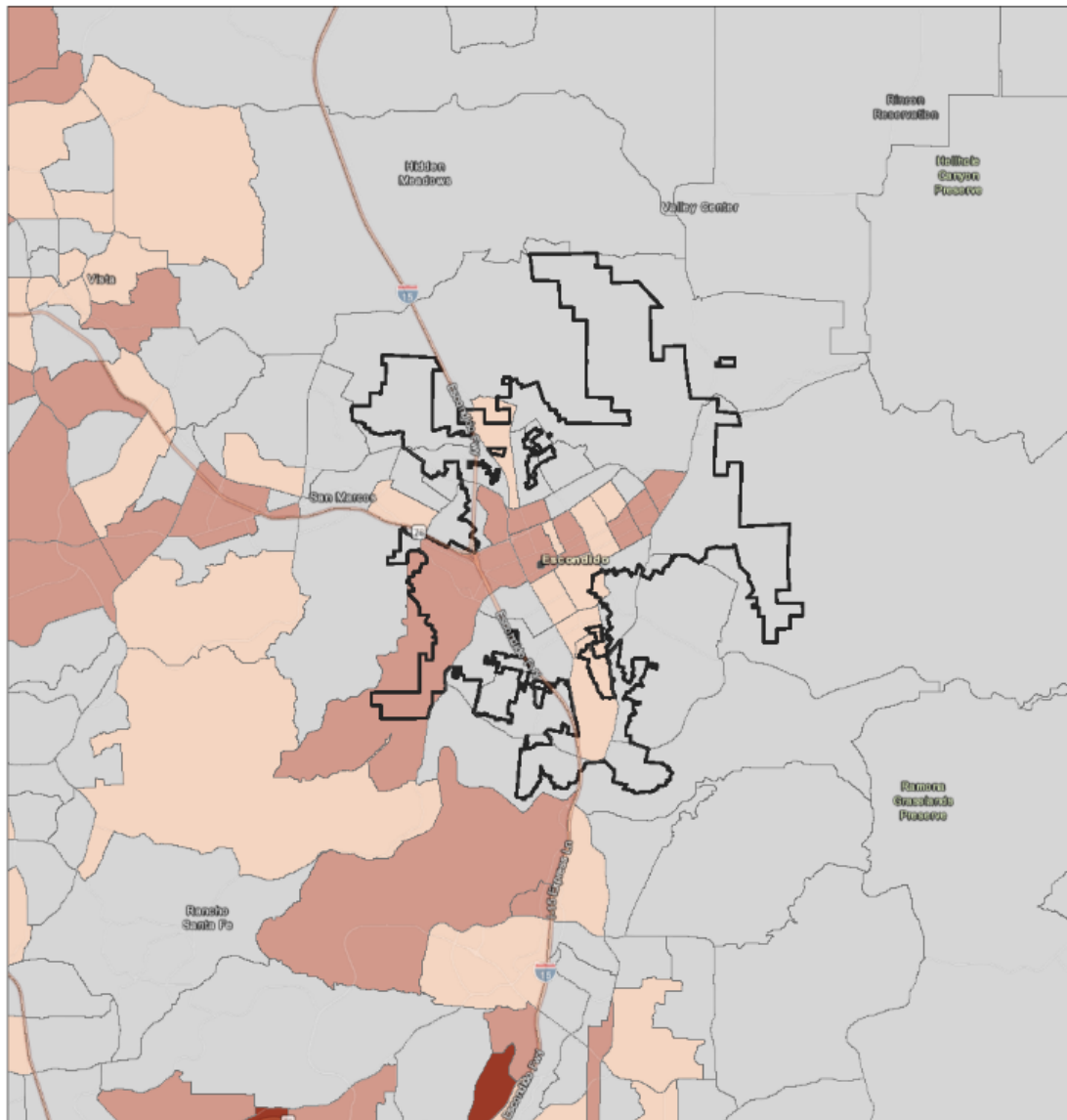
Housing Choice Vouchers

The Housing Choice Voucher Program (HCV) provides rental assistance to very low income households who obtain housing in the private rental market. The HCV program's success depends upon the ability of participants to search for and find suitable housing in the private rental market. The program encourages participants to avoid high-poverty neighborhoods, and encourages the recruitment of landlords with rental properties in lower-poverty neighborhoods. Figure E-17 shows that housing choice voucher use is concentrated in the central census tracts of the City near its downtown area, where 5 to 15% of the tract renters are HCV participants. These census tracts with the HCV participants also have among the lowest Housing Affordability Index in the area and the highest concentration of population living in poverty (Figure E-18 and Figure E-19). This means HCV participants are finding housing in the most affordable areas of the City. However, these affordable areas are also the areas with the concentration of special needs households (persons with disabilities, children in female-headed households, low and moderate income households), and low resources according to the TCAC Opportunity Maps.

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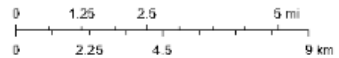
Figure E-17: Distribution of Housing Choice Vouchers in Escondido



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- City/Town Boundaries
- (R) Housing Choice Vouchers - Tract
 - No Data
 - > 0 - 5%
 - > 5% - 15%
 - > 30% - 60%

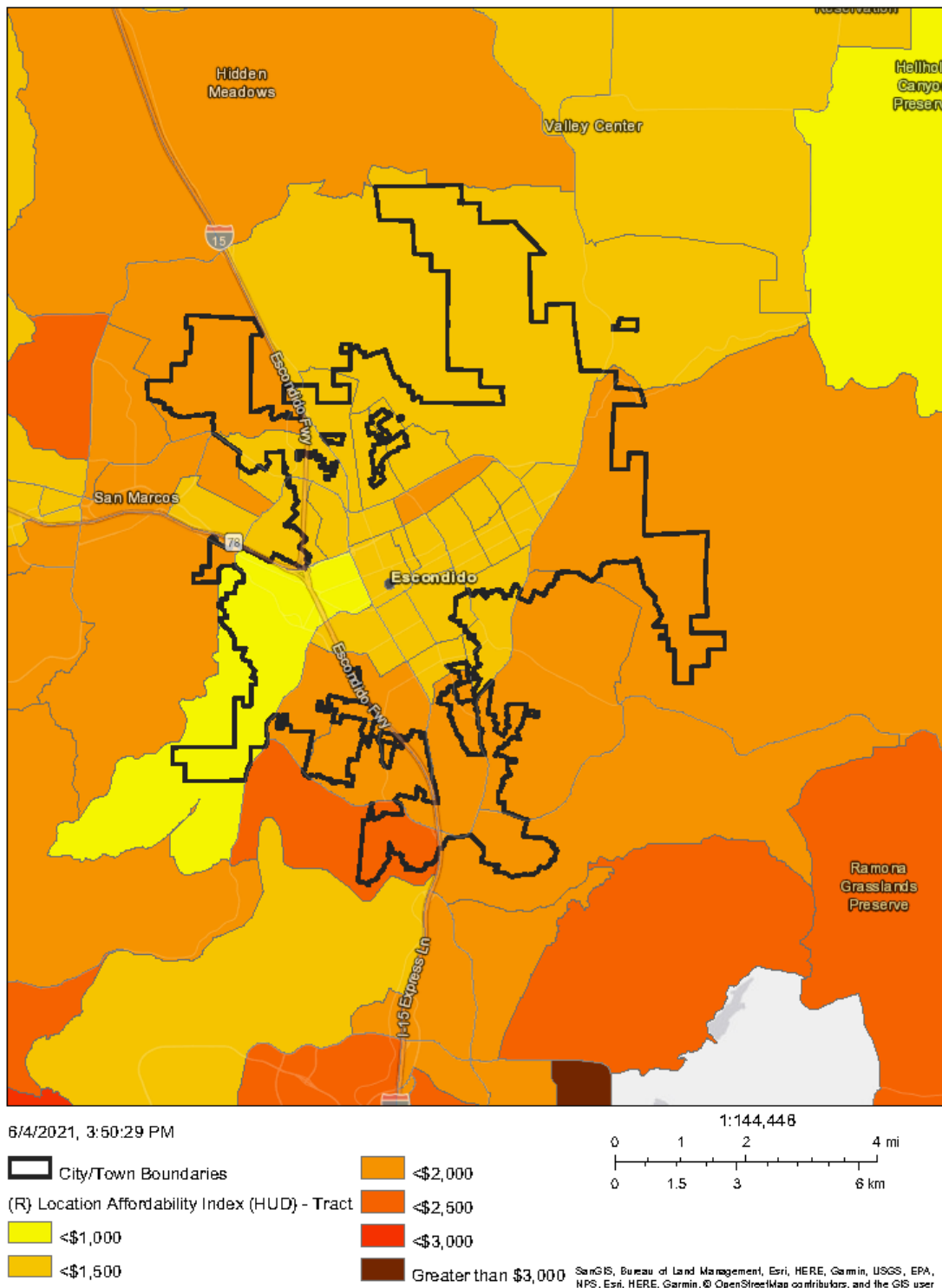


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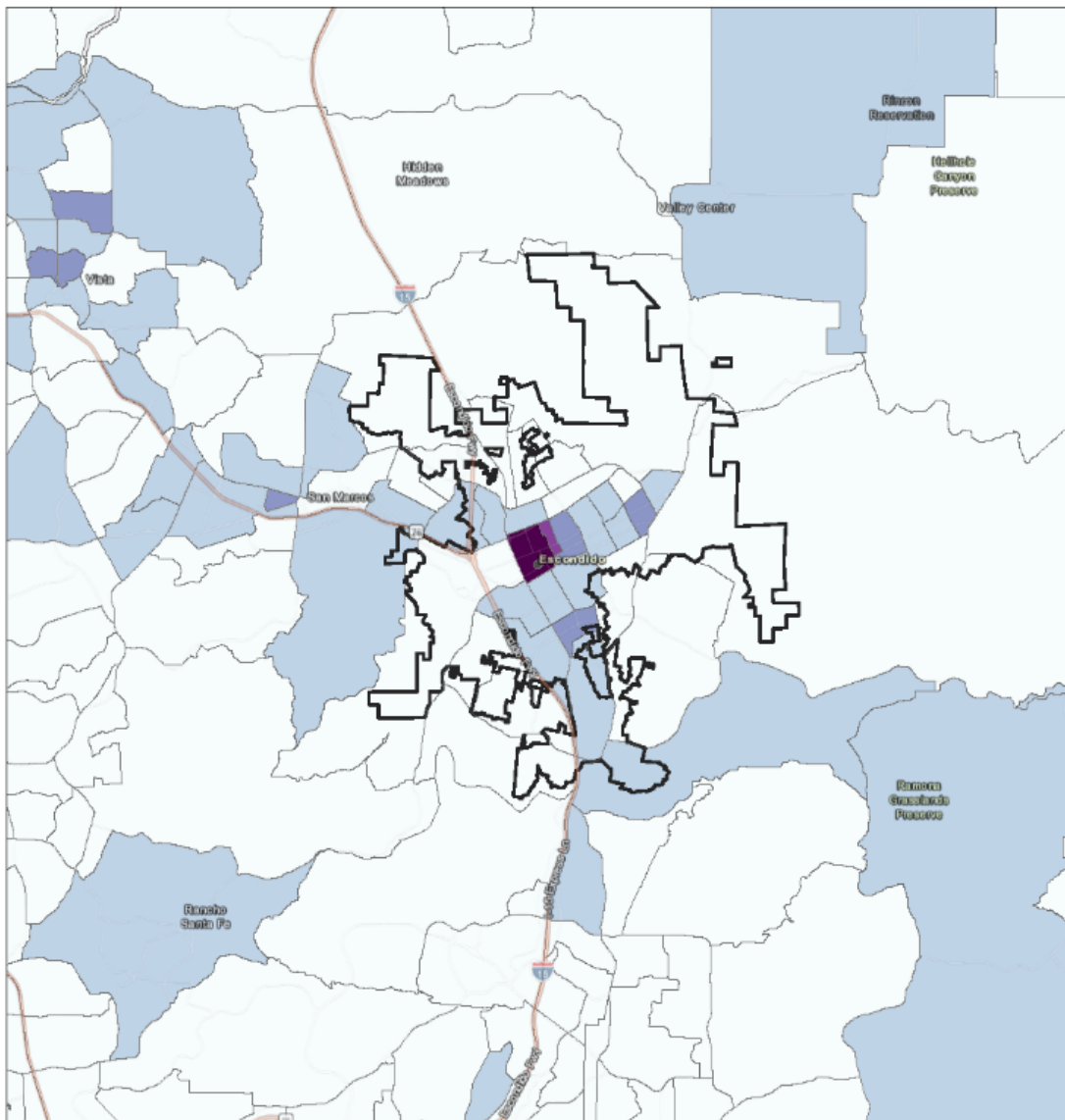
Figure E-18: Affordability Index in Escondido



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Figure E-19: Poverty Status in Escondido



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City/Town Boundaries

(R) Poverty Status (ACS, 2015 - 2019) - Tract

< 10%

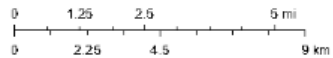
10% - 20%

20% - 30%

30% - 40%

> 40%

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SanGIS, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S.



Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs)

To assist in this analysis of Racially/Ethnically Concentrated Areas of Poverty (R/ECAP), the Department of Housing and Community Development (HCD) and the California Tax Credit Allocation Committee (CTCAC) convened in the California Fair Housing Task force to “provide research, evidence-based policy recommendations, and other strategic recommendations to HCD and other related state agencies/departments to further the fair housing goals (as defined by HCD).” The Task force has created Opportunity Maps to identify resources levels across the State “to accompany new policies aimed at increasing access to high opportunity areas for families with children in housing financed with 9% Low Income Housing Tax Credits (LIHTCs)”. These opportunity maps are made from composite scores of three different domains made up of a set of indicators. Table E-62 shows the full list of indicators. The opportunity maps include a measure or “filter” to identify areas with poverty and racial segregation. To identify these areas, census tracts were first filtered by poverty and then by a measure of racial segregation. The criteria for these filters were:

- Poverty: Tracts with at least 30% of population under federal poverty line
- Racial Segregation: Tracts with location quotient higher than 1.25 for Blacks, Hispanics, Asians, or all people of color in comparison to the County

Table E-62: Domains and List of Indicators for Opportunity Maps	
Domain	Indicator
Economic	Poverty Adult education Employment Job proximity Median home value
Environmental	CalEnviroScreen 3.0 pollution Indicators and values
Education	Math proficiency Reading proficiency High School graduation rates Student poverty rates
Source: California Fair Housing Task Force, Methodology for the 2020 TCAC/HCD Opportunity Maps, December 2020	

According to the California Fair Housing Task Force’s 2021 opportunity maps, there are two census tracts (202.14 and 202.13) or areas of high racial segregation and poverty in Escondido (Figure E-20). These two tracts are adjacent and are located southeast of the intersection of North Centre Parkway and Lincoln Ave in the center of the City. Parts of high segregation and high poverty were also identified as the Mission Park community in a 2006 report by the National



Latino Research Center (Figure E-21). The Mission Park community is discussed in detailed in the Local Knowledge section). Regionally, areas with high segregation and poverty are located in Oceanside in the North County and in the Southern County, specifically in Chula Vista, National City, and the City of San Diego.

Figure E-20: 2021 TCAC/HCD Opportunity Map

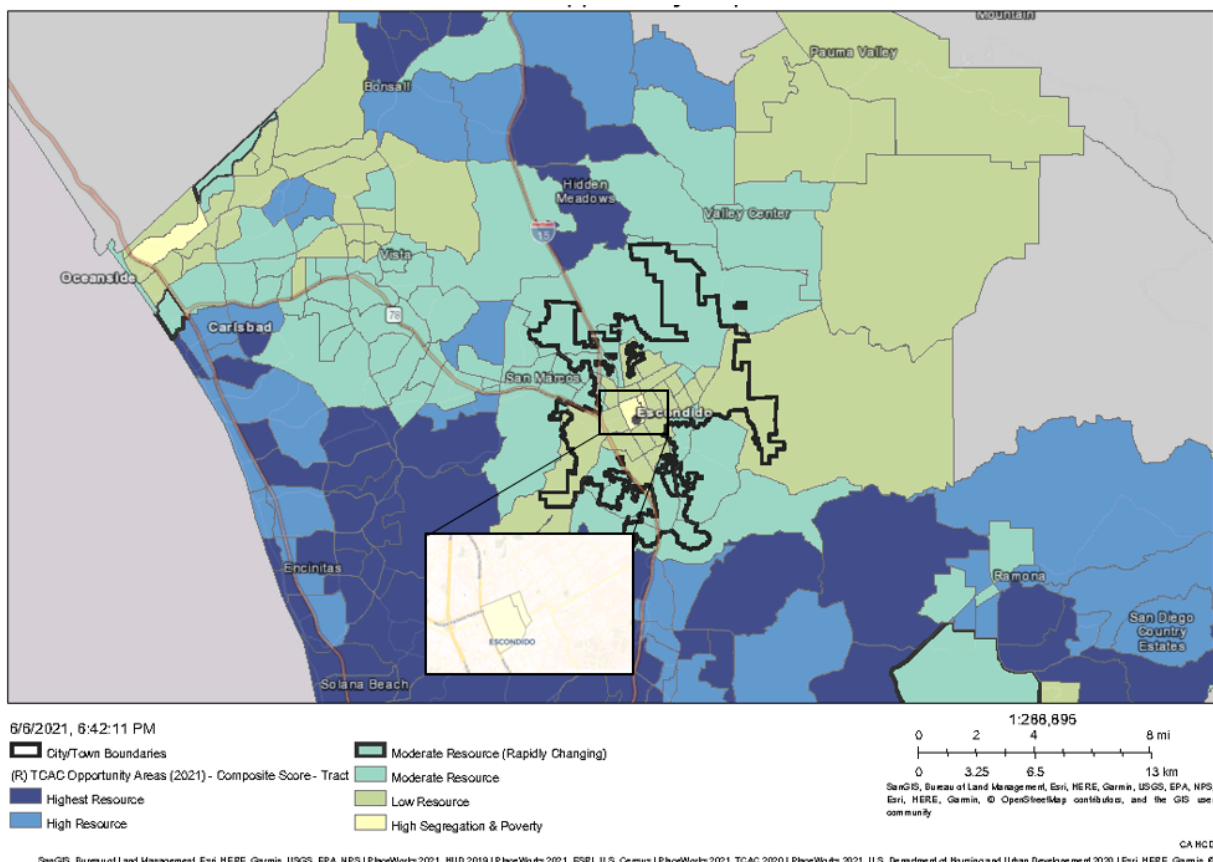
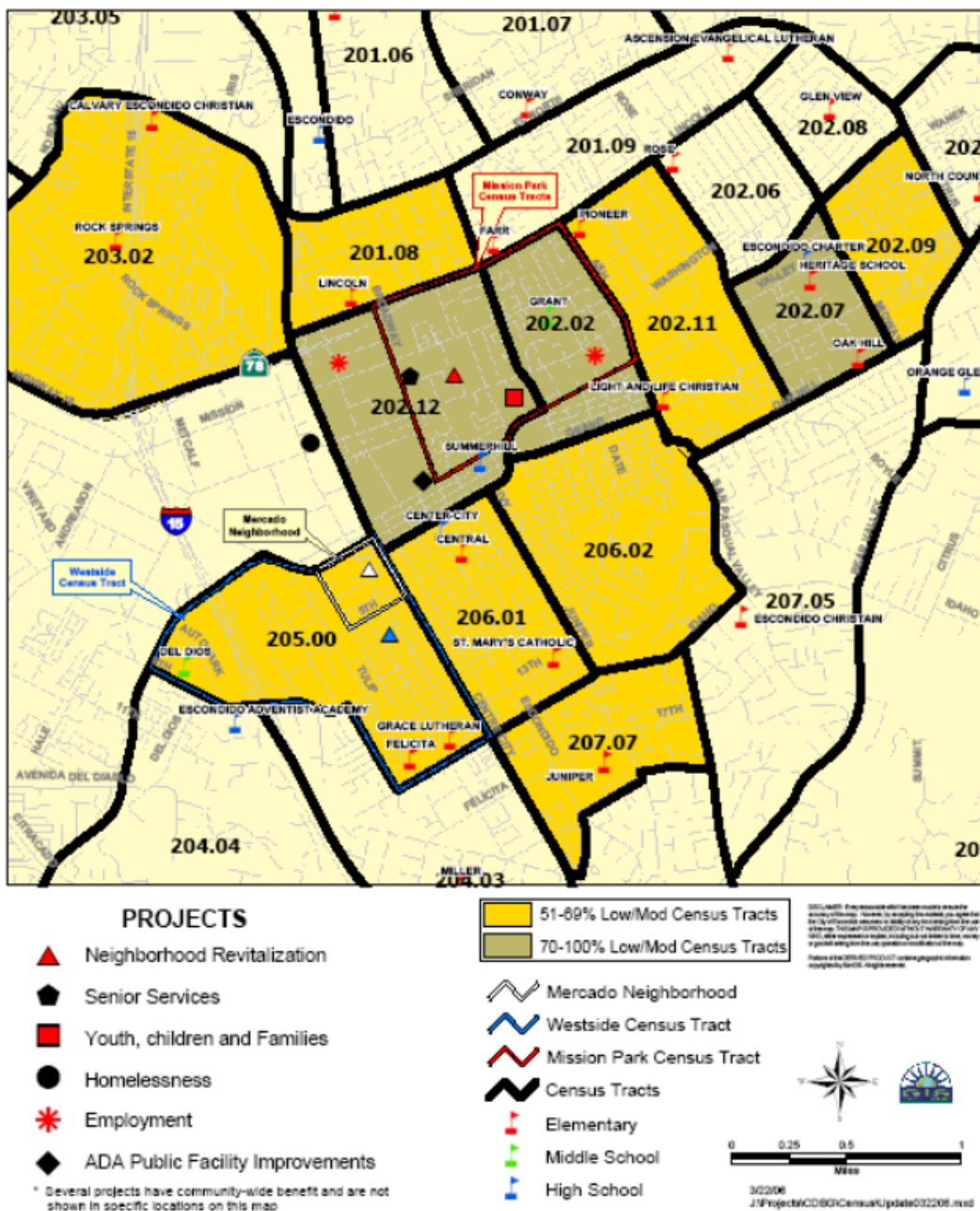




Figure E-21: Mission Park Community



Note: The term "Mission Park" is not readily recognized by community residents. Coined by the city, it demarcates a locale in the center of the City. It is bordered by Lincoln Avenue to the north, Ash Street to the east, Valley Parkway to the south and Centre City Parkway to the west.

Source: National Latino Research Center and Cal State San Marcos.
https://www.csusm.edu/nlrc/documents/2006/missionpark_community_survey_2006.pdf



In an effort to identify racially/ethnically-concentrated areas of poverty (RECAPs), HUD has identified census tracts with a majority non-White population (greater than 50 percent) and has a poverty rate that exceeds 40 percent or is three times the average tract poverty rate for the metro/micro area, whichever threshold is lower. In San Diego County, there are RECAPs scattered in small sections of El Cajon, La Mesa, Lemon Grove, National City, and Chula Vista (Figure E-22). A census tract in the center of the City of Escondido is considered a R/ECAPs (Figure E-23).

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FIGURE E-22: RACIALLY AND ETHNICALLY CONCENTRATED AREAS OF POVERTY (R/ECAPS) - SAN DIEGO COUNTY

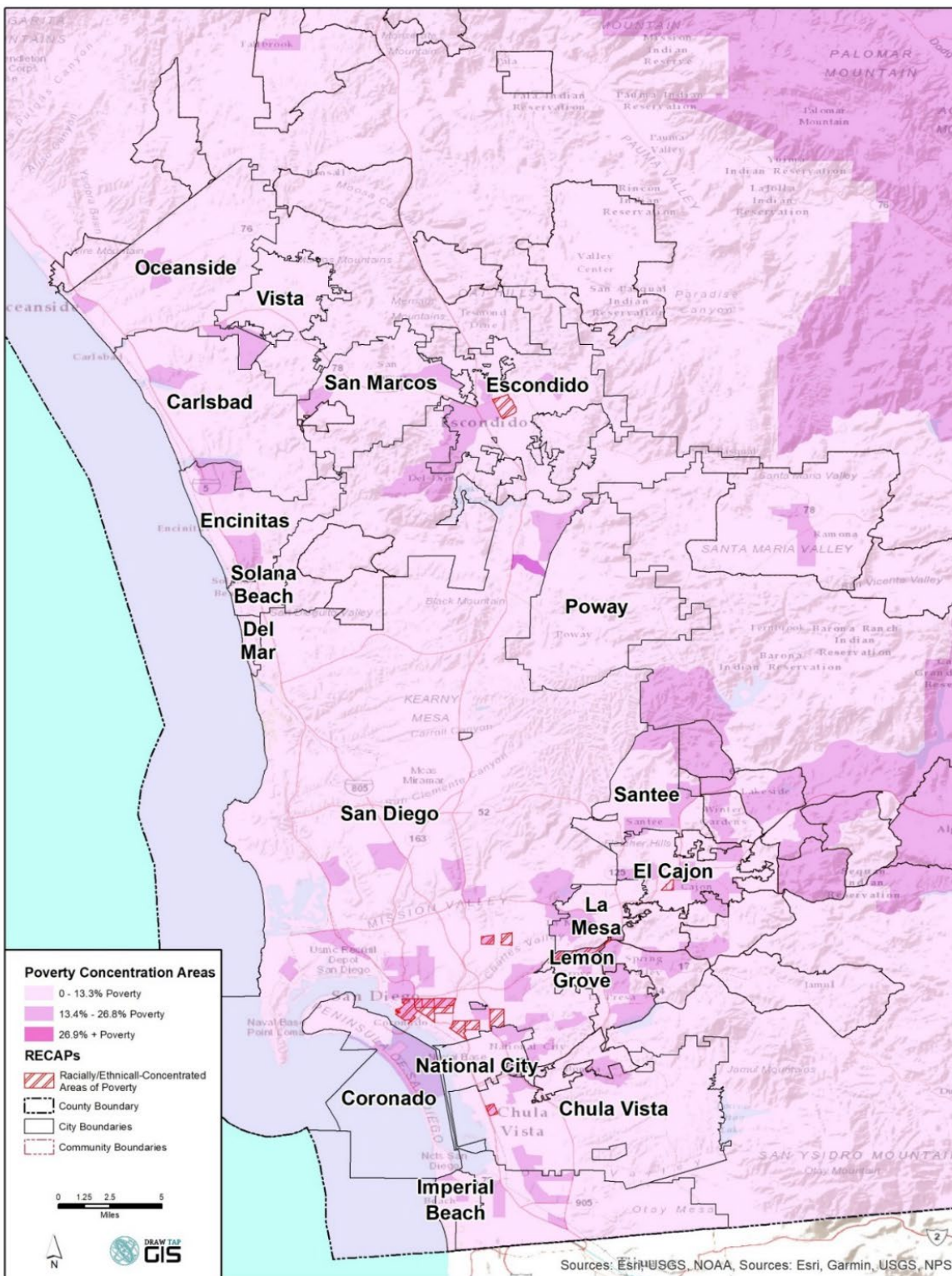
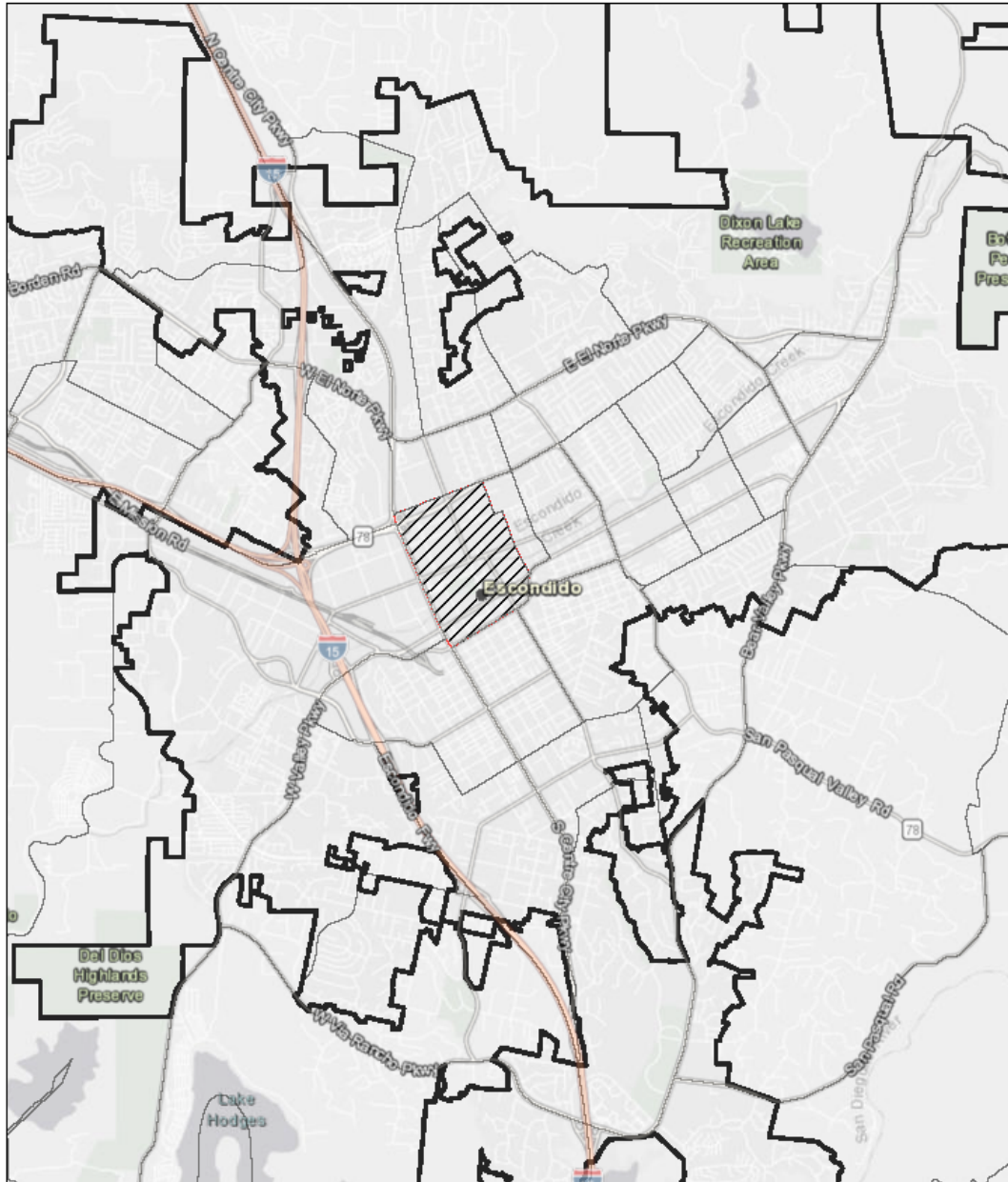




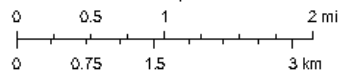
Figure E-23: Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs) - Escondido



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City/Town Boundaries

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Esri, HERE, Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community

Esri, HERE | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S. Department of Housing and Urban Development 2020 | CA HCD



Racially Concentrated Areas of Affluence

While racially concentrated areas of poverty and segregation (RECAPs) have long been the focus of fair housing policies, racially concentrated areas of affluence (RCAAs) must also be analyzed to ensure housing is integrated, a key to fair housing choice. According to a policy paper published by HUD, RCAA is defined as affluent, White communities.¹⁰ According to HUD's policy paper, Whites are the most racially segregated group in the United States and in the same way neighborhood disadvantage is associated with concentrated poverty and high concentrations of people of color, conversely, distinct advantages are associated with residence in affluent, White communities."

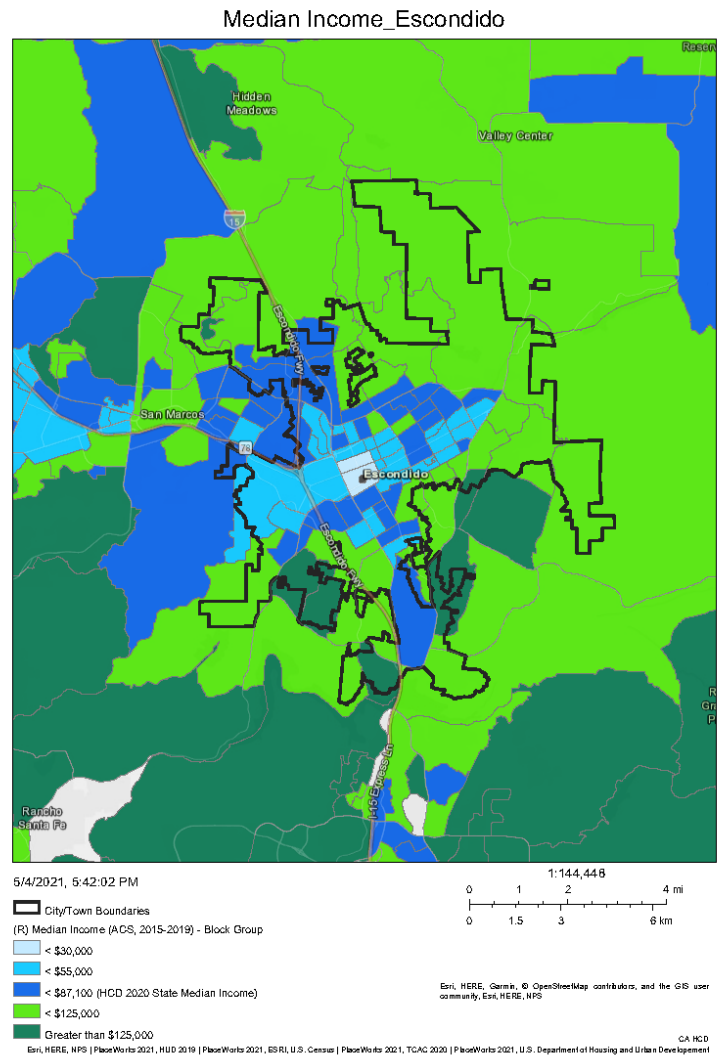
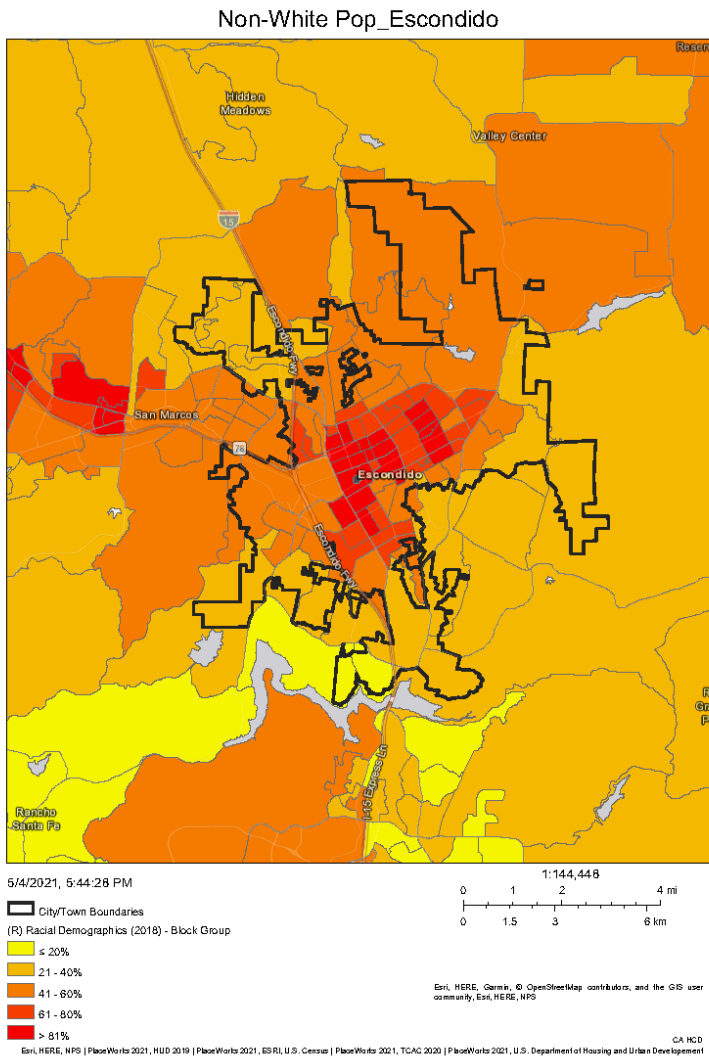
While HCD has created its own metric for RCAAs, at the time of this writing the map on the AFFH tool is not available. Thus, the definition of RCAAs used in this analysis uses the definition by the scholars at the University of Minnesota Humphrey School of Public Affairs cited in HCD's memo¹¹: "RCAAs are defined as census tracts where 1) 80% or more of the population is White, and 2) the median household income is \$125,000 or greater (slightly more than double the national the median household income in 2016). As shown in Figure E-24 there are two block groups in the Southern tip of the City (in yellow) with more than 80% non-Hispanic white population. The median income in one of these block groups is more than \$125,000 (and between \$87,000 and \$125,000 in the other). At a City level, block groups with higher non-White population (lower non-minority concentrations shown in map), also tended to have higher median incomes.

¹⁰ Goetz, Edward G., Damiano, A., & Williams, R. A. (2019) Racially Concentrated Areas of Affluence: A Preliminary Investigation.' Published by the Office of Policy Development and Research (PD&R) of the U.S. Department of Housing and Urban Development in Cityscape: A Journal of Policy Development and Research (21,1, 99-123).

¹¹ Affirmatively Furthering Fair Housing: Guidance for All Public Entities and for Housing Elements (April 2021 Update)



Figure E-24: Racially/Ethnically Segregated Areas of Affluence (RCAAs) - Escondido





Fair Housing Issue

Patterns of segregation. Minorities, low income households, children in female-headed households, housing choice voucher use, and persons with disabilities are concentrated in the downtown areas (center census tracts of the City). These census tracts also had high poverty rates. A census tract (202.13) within this segregated area (in the downtown) is also considered a R/ECAP. By contrast, census tracts in the outer edges of the City have a concentration of whites and higher median incomes.

Escondido has developed from a rural community to a city with a dense urban center surrounded by suburban and rural uses. The central portion of Escondido offers a mixed use development comprised primarily of retail and housing uses, ranging from single family housing to some of the highest density multi-family housing in the City. Central Escondido includes the city's historic downtown and Old Escondido Historic District, medical facilities and schools. North Central Escondido also includes the Mission Park Area which has a pattern of residential overcrowding, prevalence of poverty and cost-burdened households, and a concentration of Hispanic households.

Central Escondido is the closest neighborhood to the Escondido Transit Center which is a multi-modal transit hub, including light rail and a bus system. Recent projects have been designed to enhance community engagement and improve accessibility and safety for pedestrians and bicyclists, including location specific (safe routes to schools), corridor (to close gaps in the bicycle/pedestrian network) and ADA improvements. Additional improvements are planned to recreate a Class I bicycle trail along the Escondido Creek as a linear trail with separate transportation and recreation elements. Other recent planning efforts to increase resources in this neighborhood while minimizing gentrification include the Downtown Grand Avenue Vision Plan, the adoption of an Updated Climate Action Plan, and ongoing efforts to create an East Valley Specific Plan.

Contributing Factors:

- Historical patterns of minority concentration
- Location of affordable housing
- Land use and zoning laws (high density and mobile park designations in these areas)
- Lack of recruitment of landlords in high opportunity areas for HCV use



Access to Opportunities

TCAC/HCD

As discussed earlier, HCD and the California Tax Credit Allocation Committee (CTCAC) convened in the California Fair Housing Task force that created Opportunity Maps to identify resources levels across the state. Every year, Fair Housing Task Force updates opportunity maps that assess census tracts for place-based characteristics, including population and demographic factors, employment access, and economic mobility. Census tracts are grouped into six categories based on an analysis of access to opportunity:

- Highest Resource
- High Resource
- Moderate Resource (Rapidly Changing)
- Moderate Resource
- Low Resource
- High Segregation & Poverty

Escondido does not have any highest resource, high resource, or moderate resource (rapidly changing) census tracts (Table E-63). While tracts range from high poverty and segregation to moderate resources, there is a geographic pattern for low resource tracts in the center of the City, which correspond with the tracts that have a high concentration of low income Hispanic population (Figure E-20, Figure E-16, and Figure E-8). These census tracts also have a high concentration of single-female headed households (Figure E-14). By contrast, tracts with moderate resources are those with married couples or married families with children, with a non-majority race composition. Overall, the City's semi-rural/suburban areas are considered moderate and low resource, and the Downtown, East Valley, and South Centre City Parkway areas are considered low resource, with two tracts considered to have "high segregation and poverty." Part of tract 202.14 considered an area of high segregation and poverty is also part of Mission Park's community.



Table E-63: Opportunity Map Scores by Census Tract

Census Tract	Economic Domain Score	Environmental Domain Score	Education Domain Score	Composite Index	Final Category
6073020103	0.379	0.092	0.424	-0.293	Moderate Resource
6073020105	0.41	0.349	0.409	-0.183	Moderate Resource
6073020106	0.412	0.431	0.171	-0.337	Low Resource
6073020107	0.236	0.655	0.156	-0.439	Low Resource
6073020108	0.087	0.309	0.092	-0.644	Low Resource
6073020109	0.25	0.332	0.126	-0.492	Low Resource
6073020202	0.051	0.265	0.108	-0.687	Low Resource
6073020206	0.046	0.32	0.451	-0.427	Low Resource
6073020207	0.058	0.294	0.415	-0.458	Low Resource
6073020208	0.238	0.34	0.422	-0.292	Moderate Resource
6073020209	0.024	0.338	0.415	-0.524	Low Resource
6073020210	0.191	0.325	0.267	-0.452	Low Resource
6073020211	0.065	0.256	0.393	-0.491	Low Resource
6073020213	0.043	0.301	0.108	N/A	High Segregation & Poverty
6073020214	0.009	0.219	0.053	N/A	High Segregation & Poverty
6073020304	0.496	0.178	0.658	0.061	Moderate Resource
6073020305	0.398	0.234	0.484	-0.139	Moderate Resource
6073020306	0.407	0.109	0.74	0.071	Moderate Resource
6073020307	0.256	0.021	0.588	-0.477	Low Resource
6073020308	0.029	0.232	0.087	-0.762	Low Resource
6073020309	0.263	0.084	0.537	-0.288	Moderate Resource
6073020401	0.573	0.082	0.644	0.021	Moderate Resource
6073020403	0.456	0.121	0.207	-0.382	Low Resource
6073020404	0.588	0.032	0.499	-0.213	Moderate Resource
6073020405	0.754	0.044	0.644	0.079	Moderate Resource
6073020500	0.209	0.111	0.222	-0.552	Low Resource
6073020601	0.13	0.162	0.113	-0.645	Low Resource
6073020602	0.188	0.287	0.036	-0.63	Low Resource
6073020705	0.364	0.448	0.405	-0.204	Moderate Resource
6073020706	0.544	0.241	0.516	-0.019	Moderate Resource
6073020707	0.197	0.574	0.207	-0.444	Low Resource
6073020708	0.581	0.354	0.46	-0.005	Moderate Resource
6073020709	0.497	0.08	0.174	-0.422	Low Resource

Source: California Fair Housing Task Force, Methodology for the 2021 TCAC/HCD Opportunity Maps, December 2020.



Opportunity Indicators

HUD developed an index for assessing fair housing by informing communities about disparities in access to opportunity. The index was included in the 2020 San Diego Regional Analysis of Impediments to Fair Housing Choice ("AI"). **Table E-64** shows index scores for the following opportunity indicator indices (values range from 0 to 100):

In Escondido:

- **Low Poverty Index:** The higher the score, the less exposure to poverty in a neighborhood. Black, Hispanic, and Native-Americans have a higher exposure to poverty than scored than White and Asian/Pacific Islanders, with Hispanics having the lowest score/highest exposure.
- **School Proficiency Index:** The higher the score, the higher the school system quality is in a neighborhood. White population had scored highest than all other races, indicating higher school quality system in their neighborhoods. Hispanics scored the lowest.
- **Labor Market Engagement Index:** The higher the score, the higher the labor force participation and human capital in a neighborhood. Whites scored the highest and Hispanics scored the lowest, indicating a higher labor force participation and human capital among Whites compared to all other minority races.
- **Transit Trips Index:** The higher the trips transit index, the more likely residents in that neighborhood utilize public transit. Hispanics scored the highest and whites scored the lowest, indicating Hispanics are more likely to use public transit.
- **Low Transportation Cost Index:** The higher the index, the lower the cost of transportation in that neighborhood. Cost of transportation was lowest for Hispanics and highest for whites. This may be related to the high use of public transit by Hispanics.
- **Jobs Proximity Index:** The higher the index value, the better access to employment opportunities for residents in a neighborhood. Native-Americans scored the highest, followed by Hispanic and Blacks. Whites scored among the lowest on job proximity, indication a lower access to employment opportunities for White residents.
- **Environmental Health Index:** The higher the value, the better environmental quality of a neighborhood.



Whites scored the highest while Hispanics scored the lowest, indicating White population has access to better environmental quality while Hispanics have the worst.

Overall, Black, Hispanic, Asian/Pacific Islander, and Native American communities were more likely to be impacted by poverty, limited access to proficient schools, lower labor market participation rates, and poor environmental quality than White residents. Hispanic residents were the most likely to reside in areas with the lowest environmental quality levels, lowest school proficiency, lowest labor market engagement and most exposure to poverty. Hispanic residents were also most likely to use public transportation.

While these indices do not show the geographic distribution of these communities, given that Hispanic population is highly concentrated in the urban downtown center of the City (including the Mission Park community), it is likely that the Hispanic community in this area of the City is experiencing unequal access to opportunities compared to other areas of the City. This is supported by the individual analysis in the previous sections of this analysis which identified tract 202.14 as R/ECAP.

In the County, Native American, Black, and Hispanic residents were more likely (compared to other racial/ethnic groups) to be impacted by poverty, limited access to proficient schools, lower labor participation rate. Black residents were most likely to reside in areas with the lowest environmental quality levels, the lowest accessibility to employment centers, and the lowest cost of transportation. Black and Asian residents scored highest as most likely to utilize public transportation.



Table E-64: Opportunity Indicators in Escondido and San Diego County

	Low Poverty	School Proficiency	Labor Market	Transit	Low Transportation Cost	Jobs	Environmental Health
Escondido							
Total Population							
White, non-Hispanic	43.28	37.79	41.14	78.66	63.19	41.67	39.58
Black, non-Hispanic	33.94	28.16	32.53	86.74	71.34	42.83	33.46
Hispanic	30.08	21.66	29.39	88.31	72.37	42.35	30.93
Asian/Pacific Islander, non-Hispanic	42.64	34.36	39.52	80.57	64.68	40.38	38.63
Native American, non-Hispanic	37.19	28.36	35.76	84.03	68.32	44.13	34.78
Population below federal poverty line							
White, non-Hispanic	35.98	32.2	37.19	84.22	68.56	42.83	35.4
Black, non-Hispanic	26.28	22.15	31.14	88.59	76.63	42.18	30.13
Hispanic	25.71	20.75	26.71	90.17	75.36	46.89	27.52
Asian/Pacific Islander, non-Hispanic	21.05	16.34	28.22	88.42	68.27	39.84	31.09
Native American, non-Hispanic	28.73	22.45	26.37	89.23	75.52	28.60	32.84
San Diego County							
Total Population							
White, Non-Hispanic	61.91	64.61	48.93	70.89	55.42	52.89	54.81
Black, Non-Hispanic	51.74	53.72	35.21	78.11	63.07	49.79	43.66
Hispanic	51.71	53.49	37.87	75.68	60.19	51.28	47.15
Asian or Pacific Islander, Non-Hispanic	65.75	64.96	55.06	78.19	59.63	51.68	47.98
Native American, Non-Hispanic	50.41	48.00	31.93	54.60	47.68	56.76	67.85
Population below federal poverty line							
White, Non-Hispanic	51.94	58.45	41.93	72.79	58.18	52.36	51.65
Black, Non-Hispanic	42.16	42.08	33.28	86.15	69.30	48.05	36.75
Hispanic	39.99	46.71	32.57	79.68	65.00	48.70	42.87
Asian or Pacific Islander, Non-Hispanic	60.01	60.14	48.58	75.21	59.26	51.72	50.68
Native American, Non-Hispanic	45.10	37.12	34.42	64.82	54.52	51.65	57.91
Source: Affirmatively Furthering Fair Housing ("AFFH") Data and Mapping Tool ("AFFH-T"), 2017.							



Fair Housing Issues

White residents are located on the outskirts of the City and have access to better schools, environmental quality, and labor market participation than Escondido minorities. There is a concentration of affluence for whites in the outskirts, with higher median incomes (lower exposure to poverty). Alternatively, minorities, which are concentrated in the center of the City have limited access to opportunities (lower school quality, environmental quality, labor force participation) and live in lower resource areas (with some in areas with high poverty and segregation).

Contributing Factors:

- Racially concentrated areas of affluence in outskirts of City
- Location of affordable housing
- Lower quality schools in central census tracts
- Lower environmental quality in central census tracts

Disproportionate Needs

The AFFH Rule Guidebook defines 'disproportionate housing needs' as 'a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing needs when compared to the proportion of a member of any other relevant groups or the total population experiencing the category of housing need in the applicable geographic area.' 24 C.F.R. § 5.152" The analysis is completed by assessing cost burden, severe cost burden, overcrowding, and substandard housing.

Housing Problems

The Comprehensive Housing Affordability Strategy (CHAS) developed by the Census for HUD provides detailed information on housing needs by income level for different types of households. The following conditions are considered housing problems according to HUD CHAS data:

- Housing cost burden, including utilities, exceeding 30 percent of gross income;
- Severe housing cost burden, including utilities, exceeding 50 percent of gross income;
- Overcrowded conditions (housing units with more than one person per room); and/or Units with physical defects (lacking complete kitchen or bathroom)



Table E-65: Any Housing Problem by Tenure and Race

With Housing Problem	White	Black	Asian	Am Ind	Pac. Islander	Hispanic	Other	All
Escondido								
Owner-Occupied	30.6%	29.5%	38.7%	8.2%	0.0%	48.8%	46.7%	35.8%
Renter-Occupied	57.7%	49.5%	51.3%	61.9%	70.0%	74.9%	53.6%	66.1%
All Households	40.5%	44.6%	43.1%	44.8%	35.0%	66.8%	50.1%	51.0%
San Diego County								
Owner-Occupied	31.2%	39.7%	33.6%	25.2%	31.5%	43.0%	35.6%	33.9%
Renter-Occupied	50.9%	62.3%	51.1%	52.0%	60.9%	67.1%	55.2%	57.1%
All Households	38.9%	55.4%	41.0%	38.0%	51.6%	57.7%	46.9%	44.8%

Source: HUD CHAS 2013-2017.

As shown in **Table E-65**, housing problems were most prevalent amongst Hispanic households. Pacific Islander and White households were least likely to have a housing problem. Approximately 67% of Hispanic households had one or more housing problem, and renter Hispanic households had the highest incidence of housing problems across of all races and tenues (75%). In comparison, only 51% of all households in the City experienced one or more housing problem. A higher proportion of Escondido households experienced housing problems than the County (51% and 45%, respectively). Escondido renters also experienced housing problems at higher rates than the County (66% versus 57%). While renter-occupied Hispanic households also experience the highest rates of housing problems in the County (67%), Escondido’s Hispanic renter households experience housing problems at higher rates.

Elderly and large households may also be subject to disproportionate housing problems, whether it is affordability or adequate physical needs (number of rooms, complete facilities). **Table E-66** shows that renter elderly (66%) and large households (84%) experience housing problems at a greater rates than all households in the City (51%) and County (45%). Renters in both the City and the County experience housing problems at a greater rate than owners. However, a larger proportion of large renter-households experience housing problems than all the County large renter-households.

Table E-66: Housing Problems for Elderly and Large Households by Tenure

With Housing Problem	Renters			Owners			All HH
	Elderly	Large HH	All Renter	Elderly	Large HH	All Owners	
Escondido	65.5%	83.8%	66.0%	34.9%	59.3%	31.9%	50.9%
San Diego County	62.1%	79.6%	57.1%	33.8%	46.3%	33.9%	44.8%

Source: HUD CHAS 2013-2017



Cost Burden

A household is considered cost burdened if it spends more than 30% of its income in housing costs, including utilities. Similar to the any housing problem trends, Hispanic households experience cost burdens at highest rate compared to all other races and all households in Escondido (Table E-67). All racial minorities except pacific islanders experienced cost burden at lower rates than Whites. Also, renters, regardless of race, experience cost burdens at higher rates than owners in both the City and County.

Escondido elderly and large households also experience cost burdens at slightly higher rates than the County, but renters of these groups experience the cost burden at the highest rates. More than two thirds of elderly-households experience cost burdens (Table E-68).

Table E-67: Cost Burden by Tenure and Race

Cost Burden >30%	White	Black	Asian	Am Ind	Pac Islander	Hispanic	Other	All
Escondido								
Owner-Occupied	29.6%	28.3%	31.6%	8.0%	0.0%	37.8%	47.1%	31.9%
Renter-Occupied	55.3%	49.7%	43.3%	61.9%	77.8%	61.0%	51.8%	57.5%
All Households	38.9%	44.6%	35.7%	44.5%	36.8%	53.9%	49.4%	44.8%
San Diego County								
Owner-Occupied	30.4%	37.5%	30.6%	22.2%	0.0%	36.3%	34.1%	31.7%
Renter-Occupied	48.5%	58.9%	43.7%	46.1%	54.2%	58.2%	51.4%	52.0%
All Households	37.5%	52.3%	36.2%	33.6%	46.9%	49.7%	44.1%	41.2%

Source: HUD CHAS 2013-2017

Table E-68: Cost Burden for Elderly and Large Households by Tenure

With Cost Burden > 30%	Elderly	Large HH	All Renter	Elderly	Large HH	All Owners	All HH
Escondido	63.7%	58.3%	57.5%	34.6%	34.2%	31.9%	44.8%
San Diego County	59.8%	56.0%	52.0%	33.5%	31.3%	31.7%	41.3%

Source: HUD CHAS 2013-2017

The highest concentration of renter- and owner-households experiencing cost burdens are located on the downtown urban center census tracts within the City (Figure E-25). Renter-households with cost burdens extend across the most of the City from West to East. In these tracts, over 60% of renter-households experience housing cost burdens. For owners, the tracts with a high concentration of owners with cost burdens is limited to two tracts in the Northern central part of the City.



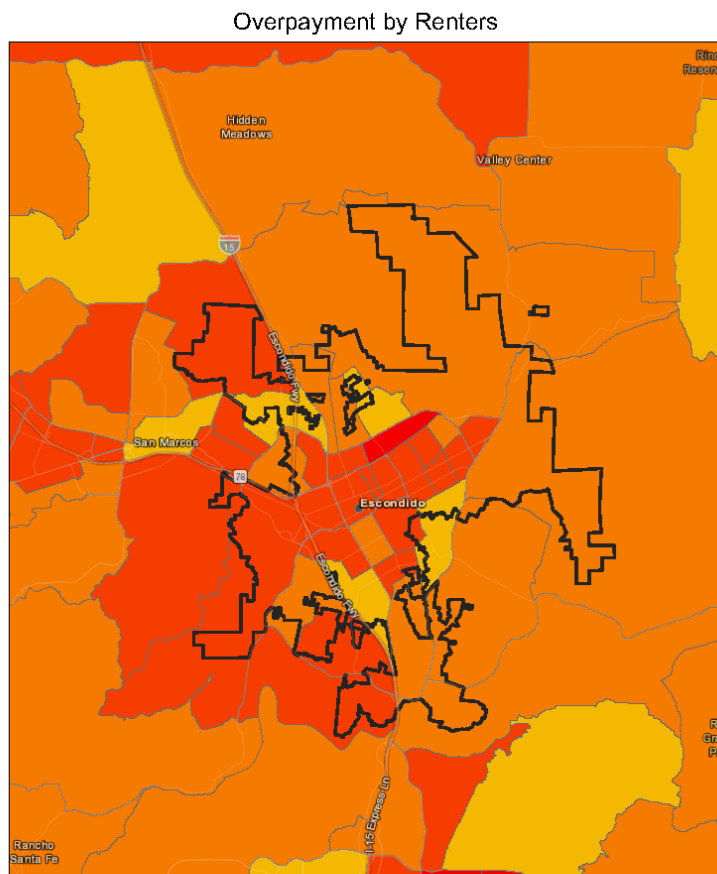
The trend continues that census tracts/ areas with high poverty and cost burdens tend to be Hispanic-dominant tracts in the center of the City

Affordability could be a barrier to housing for persons with disabilities or special needs populations who rely on Supplemental Security Income as their primary source of income, which ranges from \$954 to \$1,776, depending on their qualifications. Households may experience cost burden when SSI incomes are not adequate to pay for rent and not increasing at rates comparable to rent increases. According to Table 34 in the Housing Element, average rental rates in Spring 2019 for a one bedroom unit was \$1,490, which would imply SSI recipients would more than 30% their income on rent.

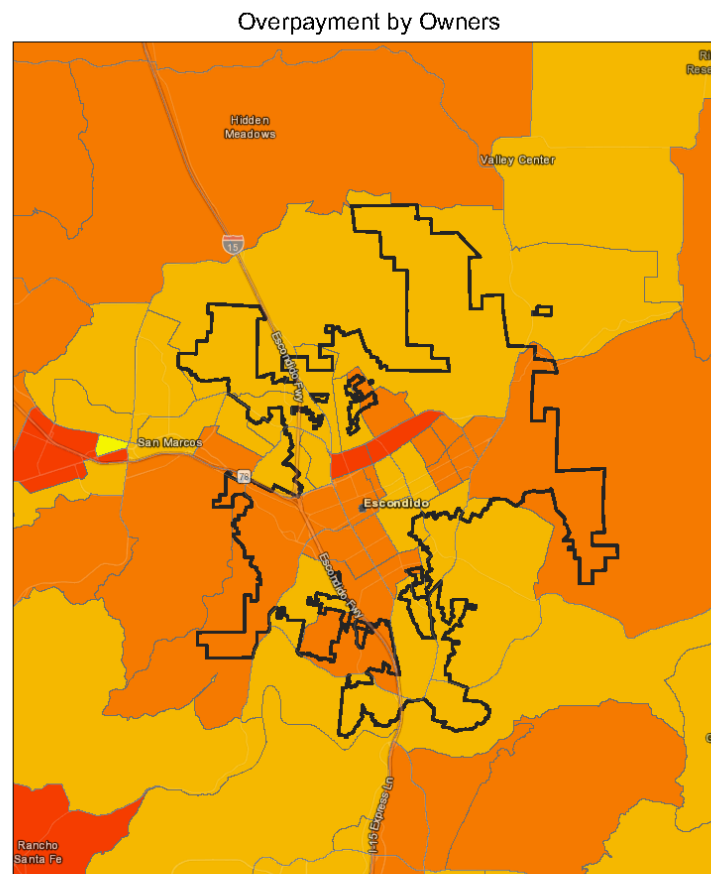
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Figure E-25: Overpayment by Renter and Owner Households



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 0 1.5 3 6 km
 City/Town Boundaries
 (R) Overpayment by Renters (ACS, 2015 - 2019) - Tract
 20% - 40%
 40% - 60%
 60% - 80%
 > 80%
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 CA HCD
 SanGIS, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks



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 City/Town Boundaries
 (R) Overpayment by Home Owners (ACS, 2015 - 2019) - Tract
 < 20%
 20% - 40%
 40% - 60%
 60% - 80%
 SanGIS, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS, Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community
 CA HCD
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Overcrowding

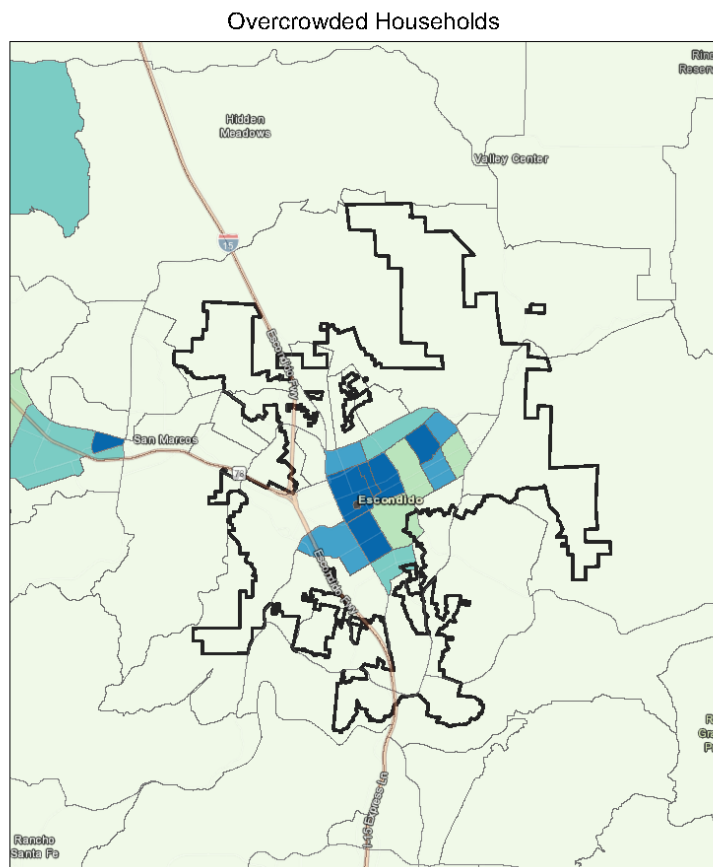
Overcrowding is defined as housing units with more than one person per room (including dining and living rooms but excluding bathrooms and kitchen). According to the 2018 five-year ACS estimates (Table 11 in main document), a higher percentage of households in Escondido (12%) are living in overcrowded conditions than the County (6.7%). Escondido has the highest concentration of overcrowded households in the north county region (Figure E-26). Within the City, overcrowded households are located in the central census tracts that have been identified as having a high concentration of Hispanic population and lower income households (Figure E-26, Figure E-8, Figure E-16). In these tracts, over 15 of households are overcrowded.

Substandard Conditions

The City estimates that in any given year, about 300 units may be considered substandard and requiring rehabilitation. Escondido's substandard units are all suitable for rehabilitation. Housing age is frequently used as an indicator of housing condition. In general, residential structures over 30 years of age require minor repairs and modernization improvements, while units over 50 years of age are likely to require major rehabilitation such as roofing, plumbing, and electrical system repairs. Over 88% of housing is older than 30 years old in the City, with 22% being older than 50 years old (Table 30 in main document). However, older housing units are concentrated in the central census tracts of the City (Figure E-27). According to 2014-2018 ACS data the median year housing was built in these tracts was before 1980 (i.e. they are at least 40 years old).



Figure E-26: Distribution of Overcrowded Households

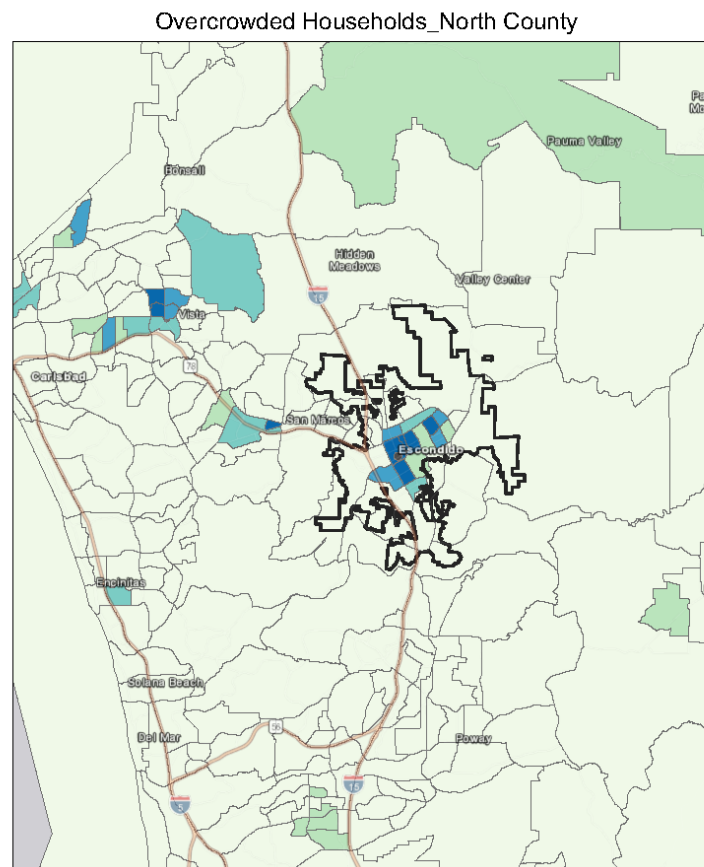


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City/Town Boundaries
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 15.01% - 20%
 ≤ 8.2% (Statewide Average)
 8.3% - 12%
 > 20%

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City/Town Boundaries
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 ≤ 8.2% (Statewide Average)
 8.3% - 12%
 > 20%

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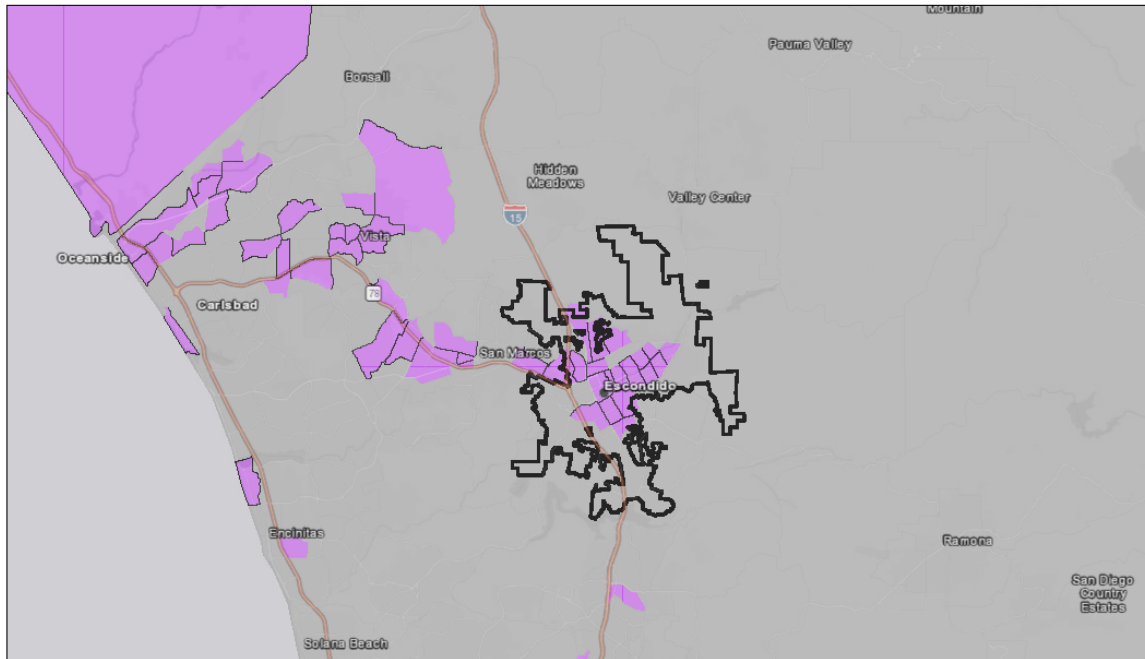
CA HCD
 SanGIS, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks



Displacement risk

UCLA’s displacement project defines residential displacement as “the process by which a household is forced to move from its residence - or is prevented from moving into a neighborhood that was previously accessible to them because of conditions beyond their control.” As part of this project, the UCLA team has identified populations vulnerable to displacement (named “sensitive communities” in the event of increased redevelopment and drastic shifts in housing cost. They defined vulnerability based on the share of low-income residents per tract and other criteria including: share of renters is above 40%, share of people of color is more than 50%, share of low-income households severely rent burdened, and proximity to displacement pressures. Displacement pressures were defined based on median rent increases and rent gaps. Using this methodology, sensitive communities are concentrated along the southern coast the City of San Diego, National City, Chula Vista and Imperial Beach and in Lemon Grove, La Mesa, and El Cajon in inland areas. In the North County, sensitive communities are located in census tracts in Oceanside, Vista, San Marcos, and Escondido (Figure E-28). Within the City of Escondido, sensitive communities are concentrated in the central and northcentral census tracts.

Figure E-28: Sensitive Communities



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City/Town Boundaries

Other

(A) Sensitive Communities (UCB, Urban Displacement Project)

Vulnerable

1:288,896
 0 2 4 8 mi
 0 3.25 6.5 13 km

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CAHCD

SanGIS, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S. Department of Housing and Urban Development 2020 | Esri, HERE, Garmin, ©



Local Knowledge

Escondido's growth has been marked by an increase in the Hispanic population. From 1990 to 2000 the City of Escondido's Hispanic population grew approximately 16 percentage points (from 23% to 39%) while the White population decreased 3 percentage points (from 71% to 68%). By 2018, the City of Escondido had one of the highest shares of Hispanic residents (52%) in the County. Only the cities of Chula Vista (60%) and National City (64%) have a higher share of Hispanic population. While the City has historically had a high proportion of Hispanic population, Hispanic population was exacerbated during World War II when the United States began contracting laborers (or braceros) to fill the labor shortages. According to the National Latino Research Center (NLRC), a labor camp located near the Mission Park neighborhood on Quince and Valley Parkway once housed nearly two hundred Mexican workers at one point. Even after the war, economic opportunities continued to attract Hispanic immigrants to the City. Today, the Mission Park community is known as a transient community, as it is the "first stop" for many immigrants in the City. As such, language is a barrier for many of its residents.

Fair Housing Issue

Disproportionate Housing Needs and Displacement Risk in census tracts in the center of the city. Renters, specifically elderly and large renter households experience cost burden at higher rates than any other household type. Cost-burdened renters are concentrated in the center of the City. Overcrowded households are also concentrated in the center of the City. Sensitive communities, those at higher risk of displacement, are also concentrated in the center of the City.

Contributing Factors

- Median rent increase
- The availability of affordable units in a range of sizes
- Lack of renter protections
- Median income of residents
- Displacement of residents due to economic pressures

B. Site Inventory

For a complete assessment of the City's obligation to affirmatively further fair housing, an analysis of the RHNA sites and their impact on fair housing conditions is provided. For each map, RHNA sites are shown by their income level. Additionally, a comparison of the RHNA units is provided against that of the whole City acreage. While this helps to illustrate fair housing patterns across the City, not all land in the City is suitable for additional housing. This includes a large area dedicated to open space in the northeast portion of the City as well as low-density residential



estates and residential agriculture zones on the outer portions of the City. These do impact the comparison percentages. The City's core and major population centers are located in central areas of the City.

The City is focusing growth as infill within the downtown area that has access to regional transit, employment opportunities, and social resources. Downtown Escondido is listed as a Smart Growth Opportunity Area by SANDAG. The long-term vision of the City is to prioritize infill development along transit corridors and nodes that provide and improve access to transportation, employment centers and social resources. As such, the majority of RHNA sites are located in the central area of the City.

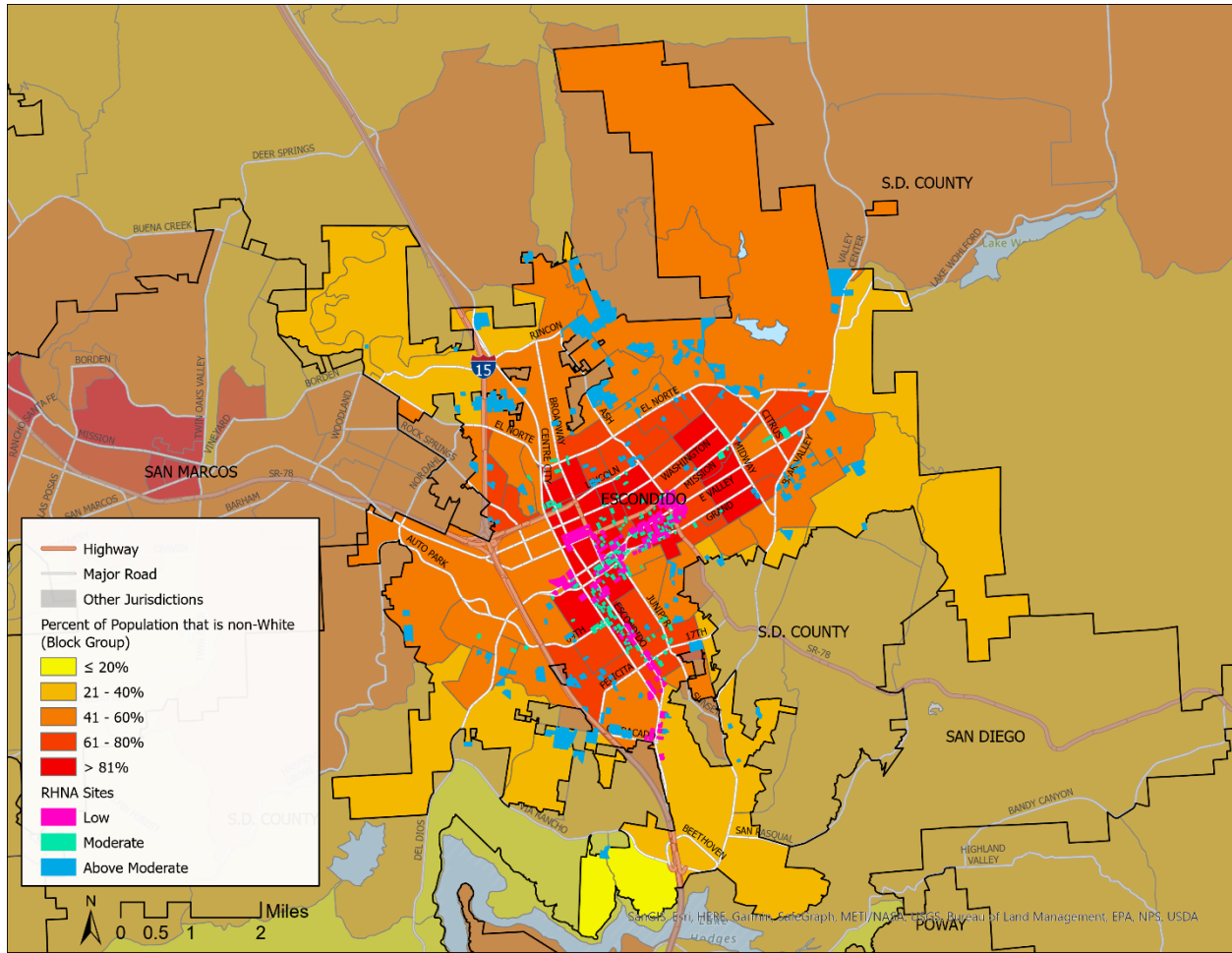
Integration and Segregation

To assess the impact of RHNA sites on integration and segregation, the sites were looked at in the context of concentration of minority populations, populations with a disability, children in married family households and income levels.

Figure E-29 displays the RHNA sites by income distribution level with the percentage of each census block group that is non-White. The accompanying chart displays the percentage of RHNA units and total city acreage that are in each quartile. The majority of low and moderate income RHNA units are clustered within the Downtown and South Centre City Specific Plan areas. Over half (55%) of the RHNA units are located in areas with greater than 80% non-White populations. Currently, 64.5% of the population in the City is non-White, and 52% of the population is Hispanic. The center of the City sees higher concentrations of minority populations than the outer areas of the City.



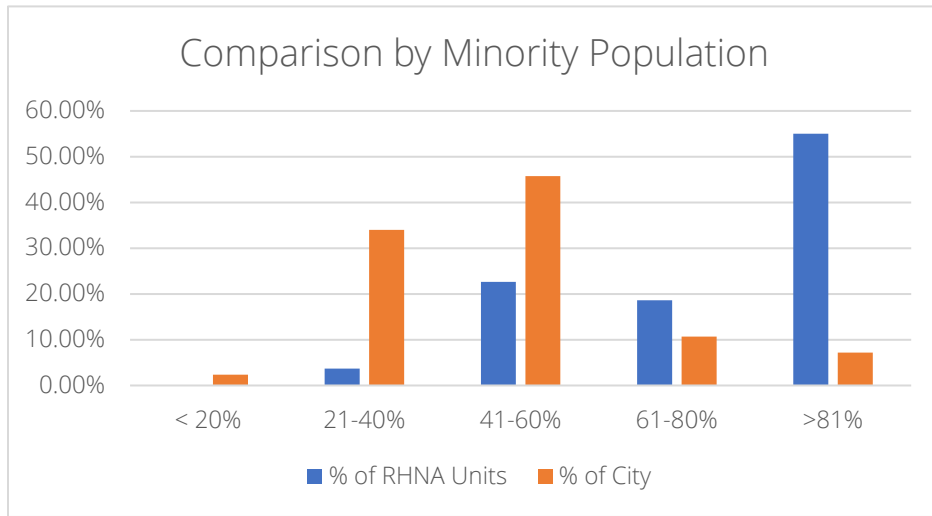
Figure E-29: RHNA Sites and Minority Population by Census Block Group



Source: HUD AFFH Data Viewer Tool and SanGIS Data Warehouse



Figure E-30: RHNA Units and City Acreage Comparison by Minority Population

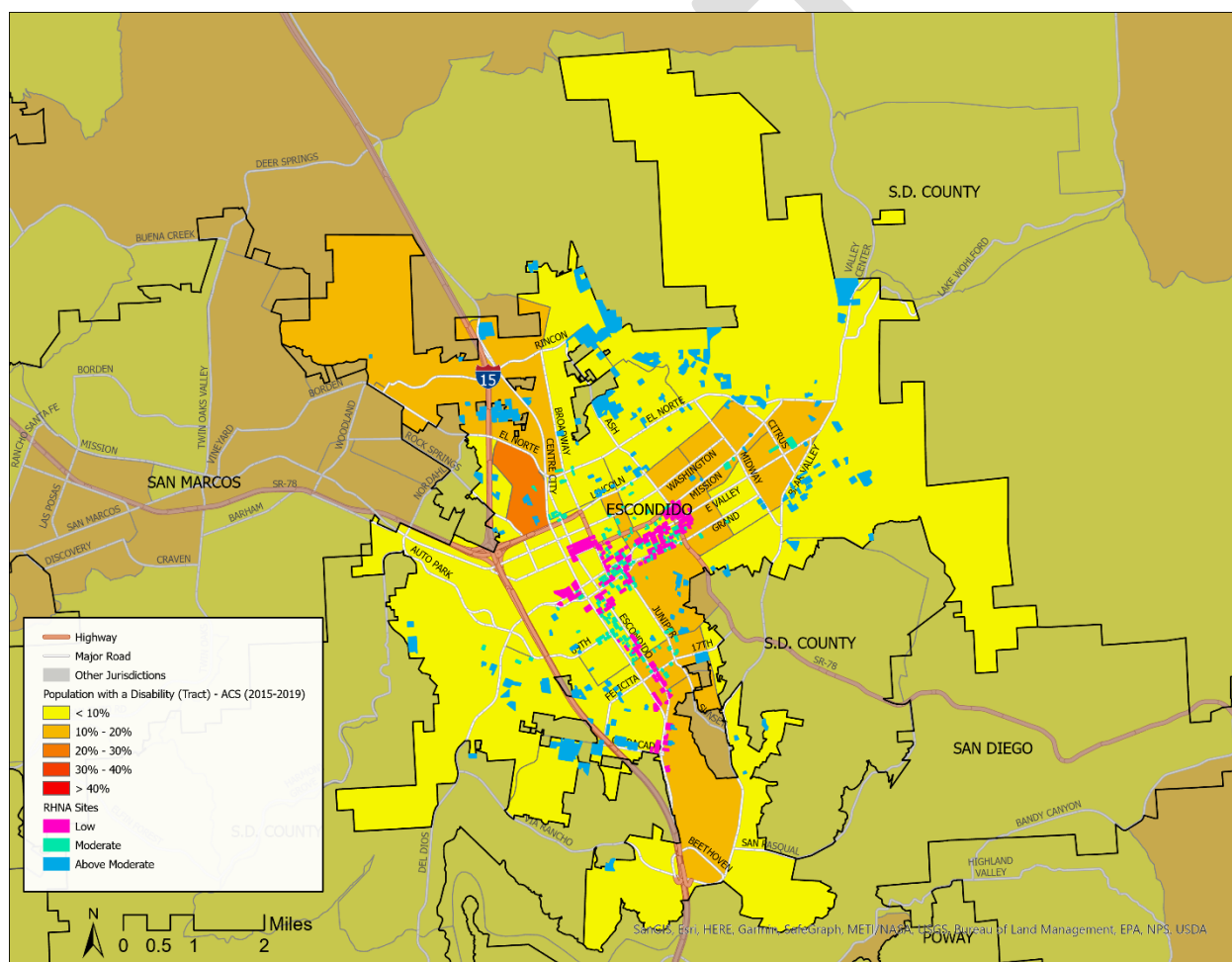


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Figure E-31 displays the RHNA sites by income distribution level against the percentage of the population with a disability by census tract. The accompanying chart displays the breakdown comparison of low-income units, RHNA units, and City acreage among the percentage of the population with a disability. The City only has one census tract that averages over 20% of the population with a disability. The breakdown is roughly the same between each of the three categories; RHNA units are not overly concentrated in areas that have either high or low percentages of the population with a disability.

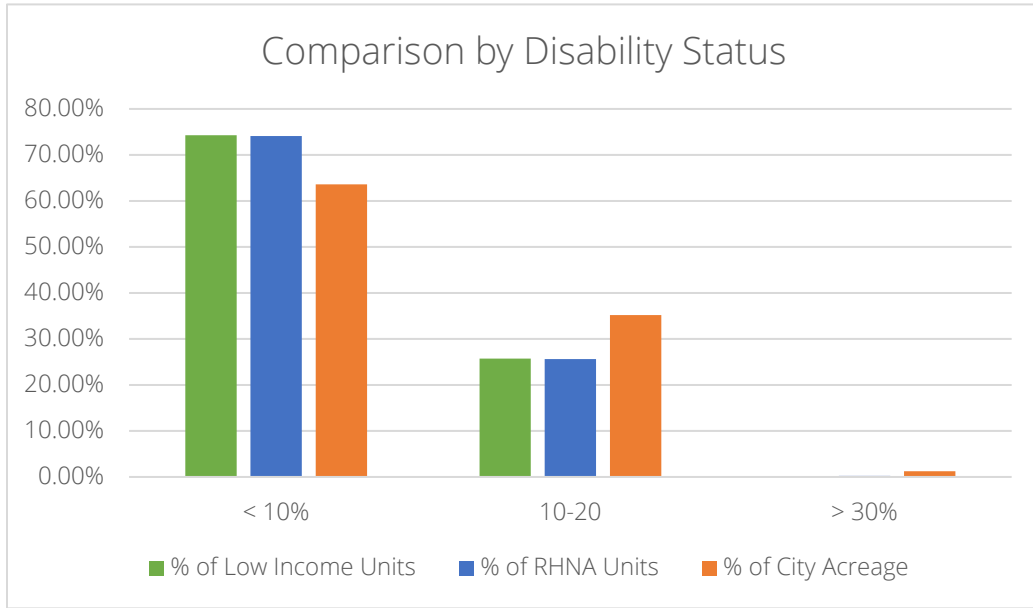
Figure E-31: RHNA Sites and Population with a Disability by Census Tract



Source: HUD AFFH Data Viewer Tool, SanGIS Data Warehouse, and MBI



Figure E-32: RHNA Units and City Acreage Comparison by Disability Status



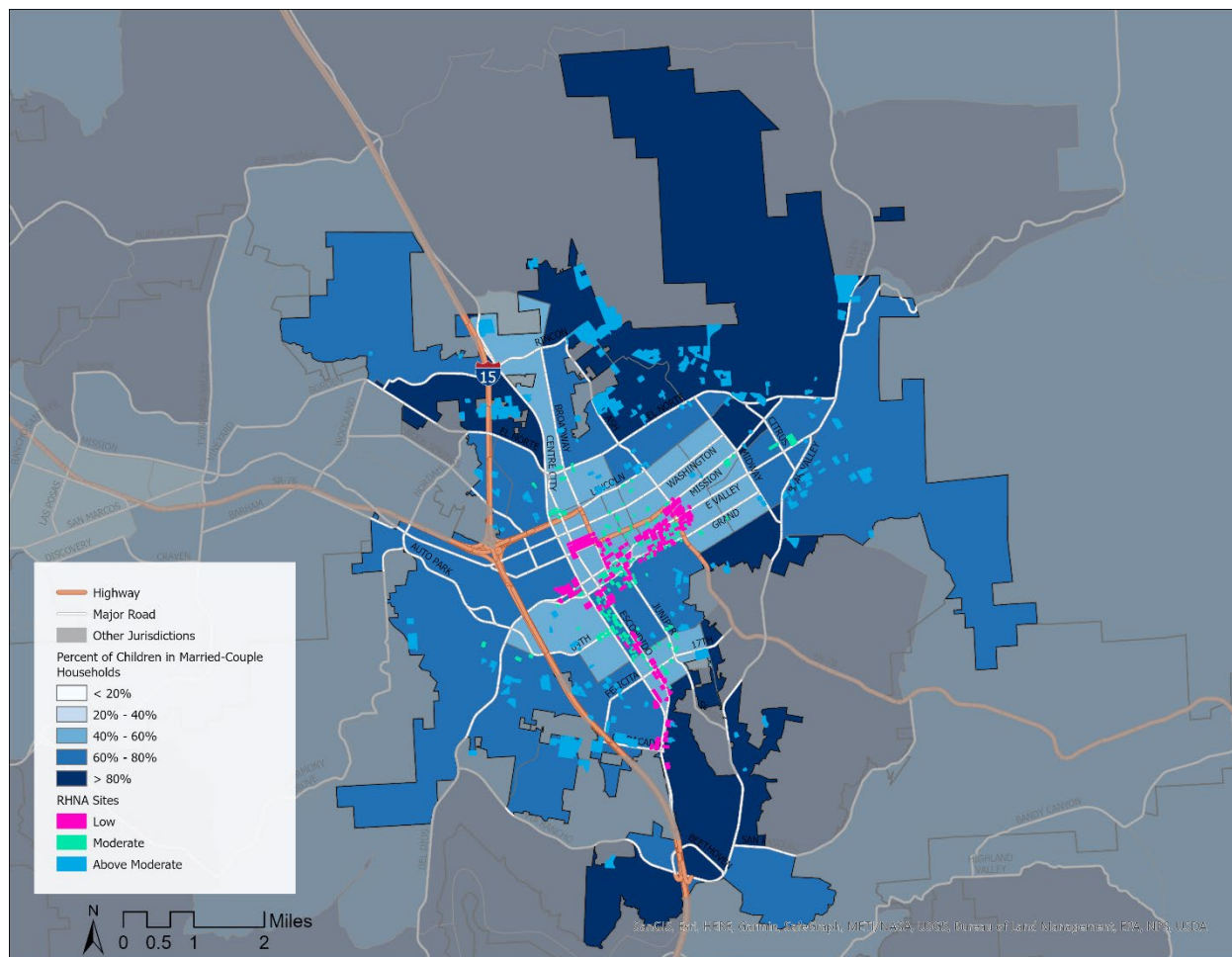
Source: HUD AFFH Data Viewer Tool and MBI

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Figure E-33 displays RHNA Sites against the percentage of children that are in married couple households by census tract. Generally, lower income RHNA sites are located in areas with lower concentration of families. Typically lower income RHNA sites are for higher density development. The smaller units are more affordable and generally more appropriate for small households.

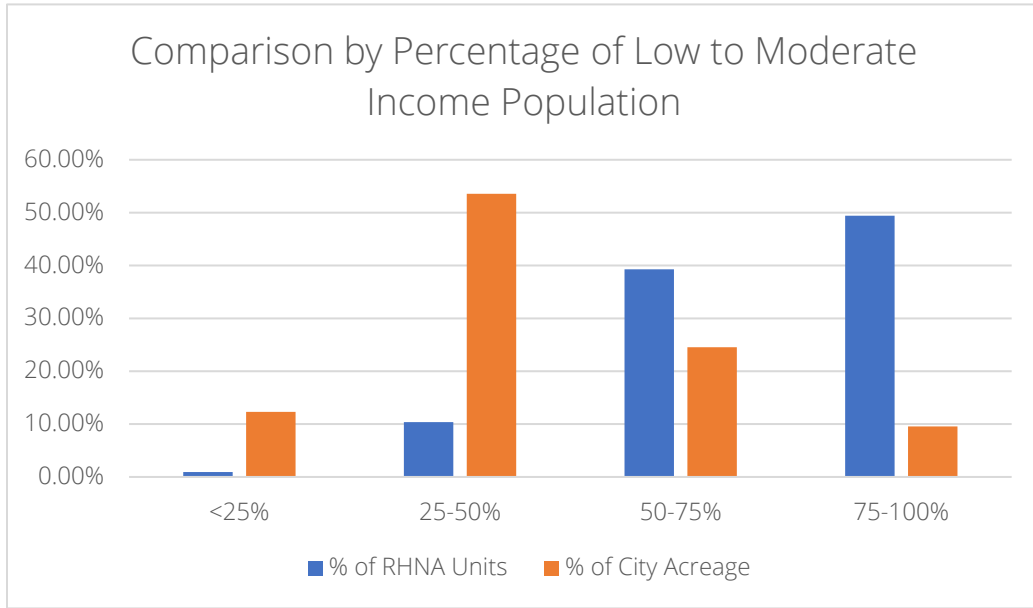
Figure E-33: RHNA Sites and Children in Married-Couple Households by Census Tract



Source: HUD AFFH Data Viewer Tool, SanGIS Data Warehouse, and MBI



Figure E-35: RHNA Units and City Acreage Comparison by Low to Moderate Income



Source: HUD AFFH Data Viewer Tool and MBI

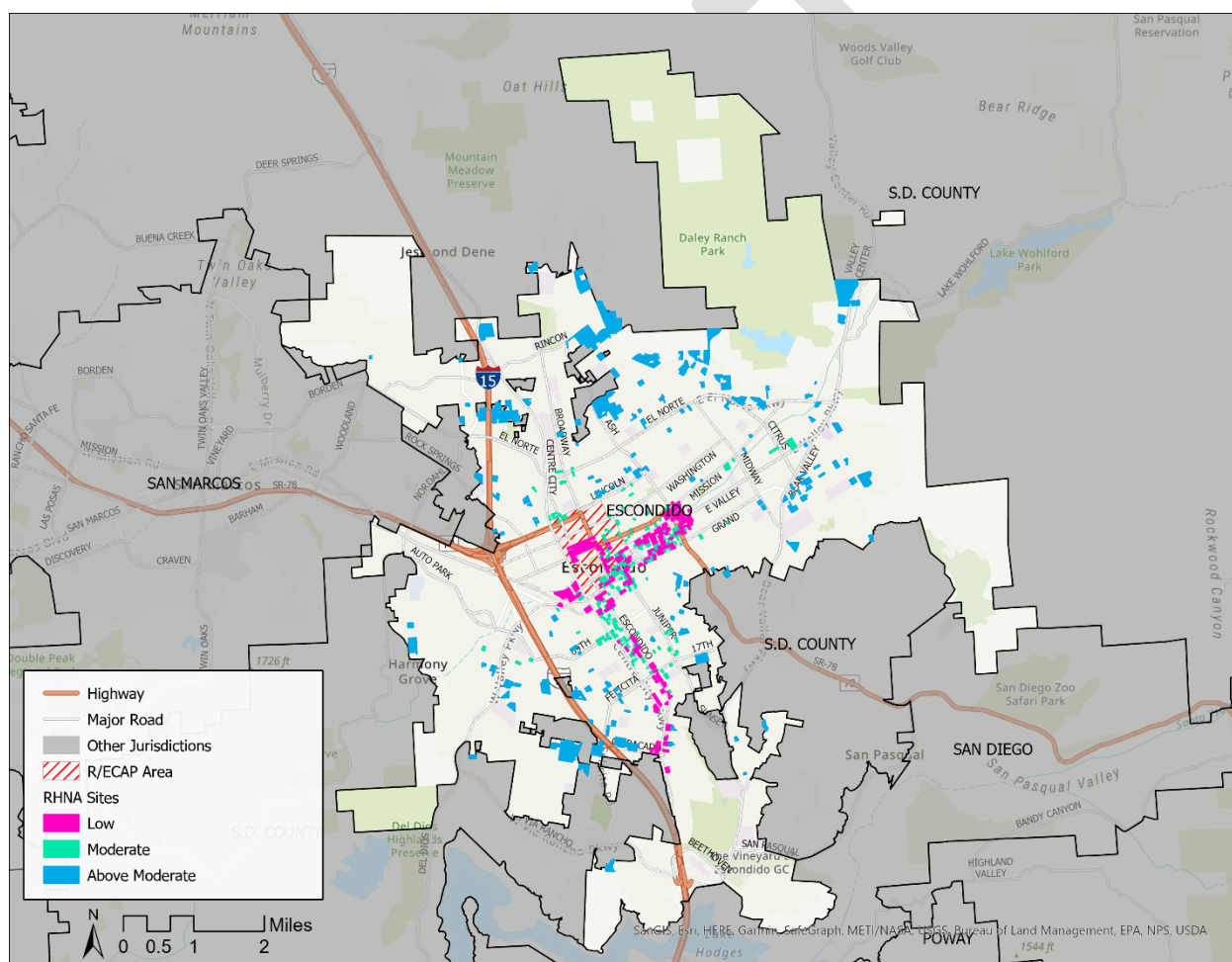
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R/ECAPs

Escondido has one R/ECAP area in the City, Census Tract 202.14. The tract is shown in *Figure E-36* along with the RHNA sites by their income level. The R/ECAP is located within the Downtown Specific Plan. About one-quarter of the RHNA units are within this R/ECAP area. Of the 2,232 units that are located in the R/ECAP area, 1,317 are low-income, 304 are moderate income, and 611 are above moderate income. The majority of RHNA sites in the R/ECAP tract are clustered south of Escondido Creek and are largely non-residential and commercial existing uses. New units are not being clustered around existing housing within the R/ECAP.

Figure E-36: RHNA Sites and R/ECAP Areas



Source: HUD AFFH Data Viewer Tool and SanGIS Data Warehouse



RCAAs

As previously discussed, the City has one census tract that could be considered an RCAA, a small tract in the southernmost part of the City. This tract is zoned Residential Estates (R-E). There is one above-moderate income RHNA site located partially within this tract.

Access to Opportunities

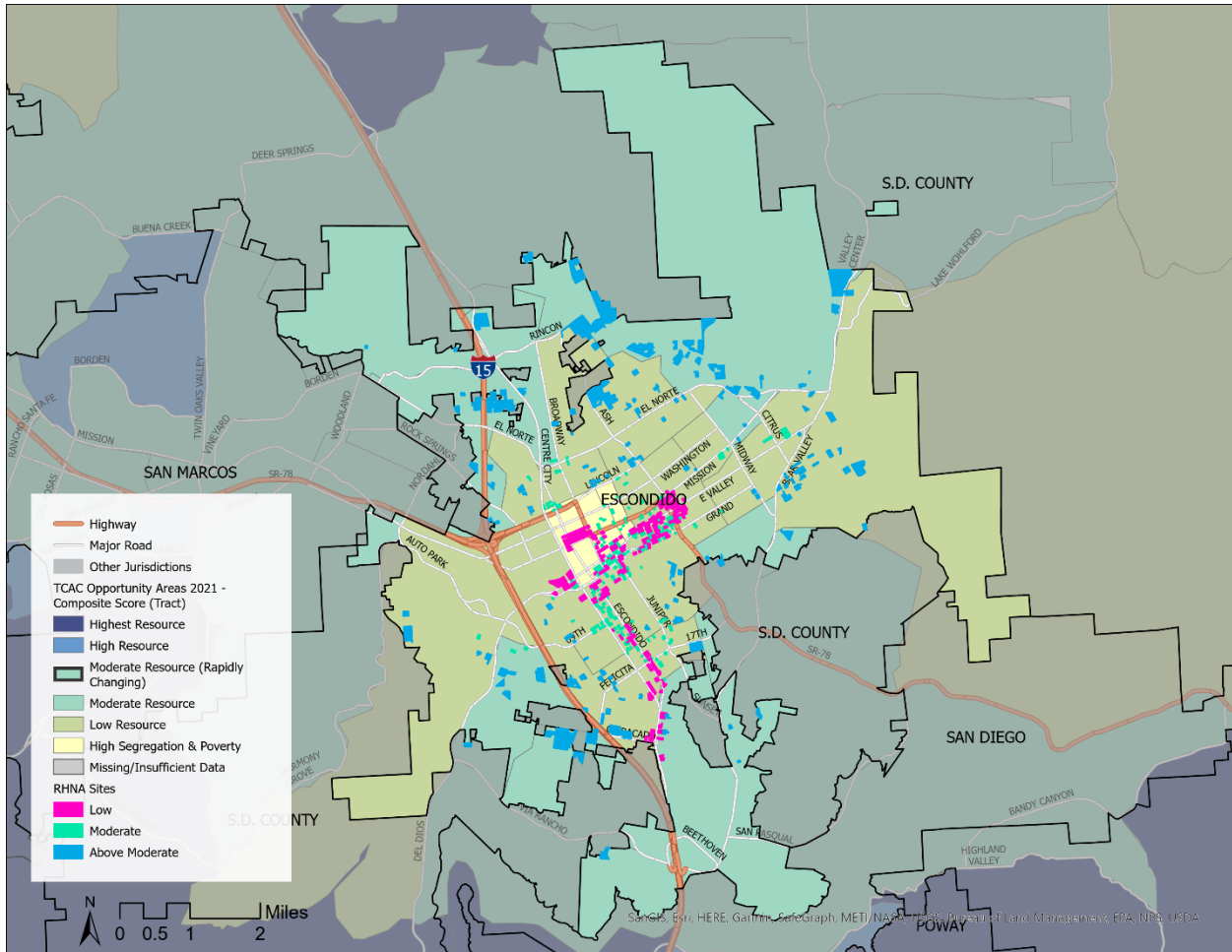
Figure E-37 displays the RHNA sites by income level and TCAC composite score by census tract. The accompanying chart displays the percentage of RHNA units and percent of the city acreage in each TCAC opportunity designation. Two census tracts, 202.13 and 202.14, fall into the high segregation and poverty designation. These census tracts have a population of 3,865 and 6,039, respectively. This area falls within the Downtown Specific Plan. The high segregation and poverty area comprises about 2% of the City.. One quarter of RHNA units are in this area. **Table E-69** displays the location of RHNA units by the TCAC designation. The majority of units (5,383) are within the low resource designation, while 2,339 are located in the area of high segregation and poverty and 787 are within the moderate resource designation.

About 45% of the City and 64% of RHNA units fall into the low resource category, while half the City and only 9% of the RHNA units fall into the moderate resource category. No areas of the City are categorized in the high or highest resource designation.

While the City has 52.2% of its total areas classified as "moderate resource," most of these moderate resource areas are semi-rural to rural in nature, and consist of open-space, agriculture, and master-planned developments. Most of these moderate resource areas are not suitable for significant high-density new housing due to environmental constraints. The City's core and major population centers are almost universally considered as low resource or high-segregation and poverty.

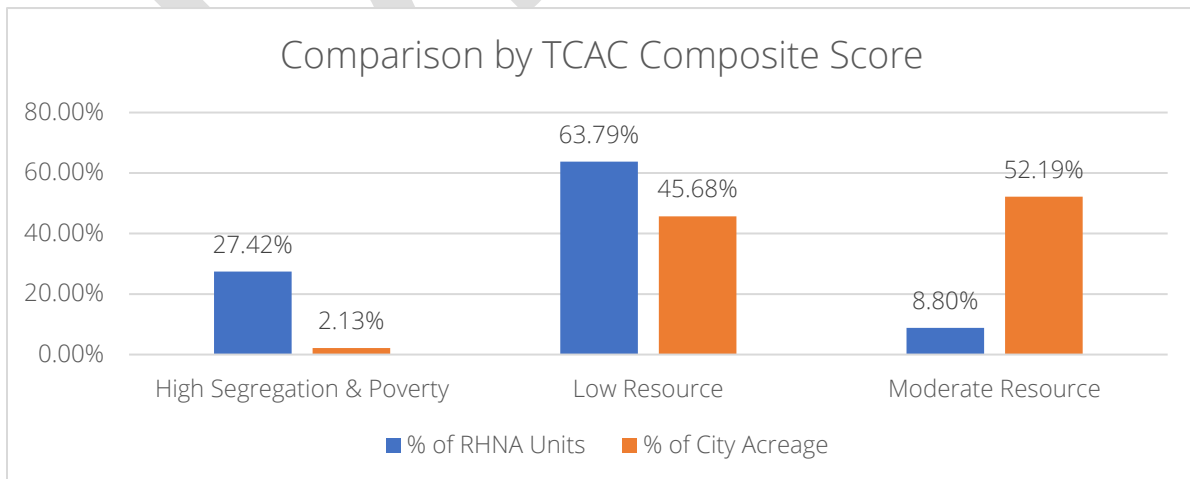


Figure E-37: RHNA Sites and TCAC Designation



Source: HUD AFFH Data Viewer Tool, SanGIS Data Warehouse and MBI

Figure E-38: RHNA Units and City Acreage Comparison by TCAC Composite Score





Source: HUD AFFH Data Viewer Tool and MBI

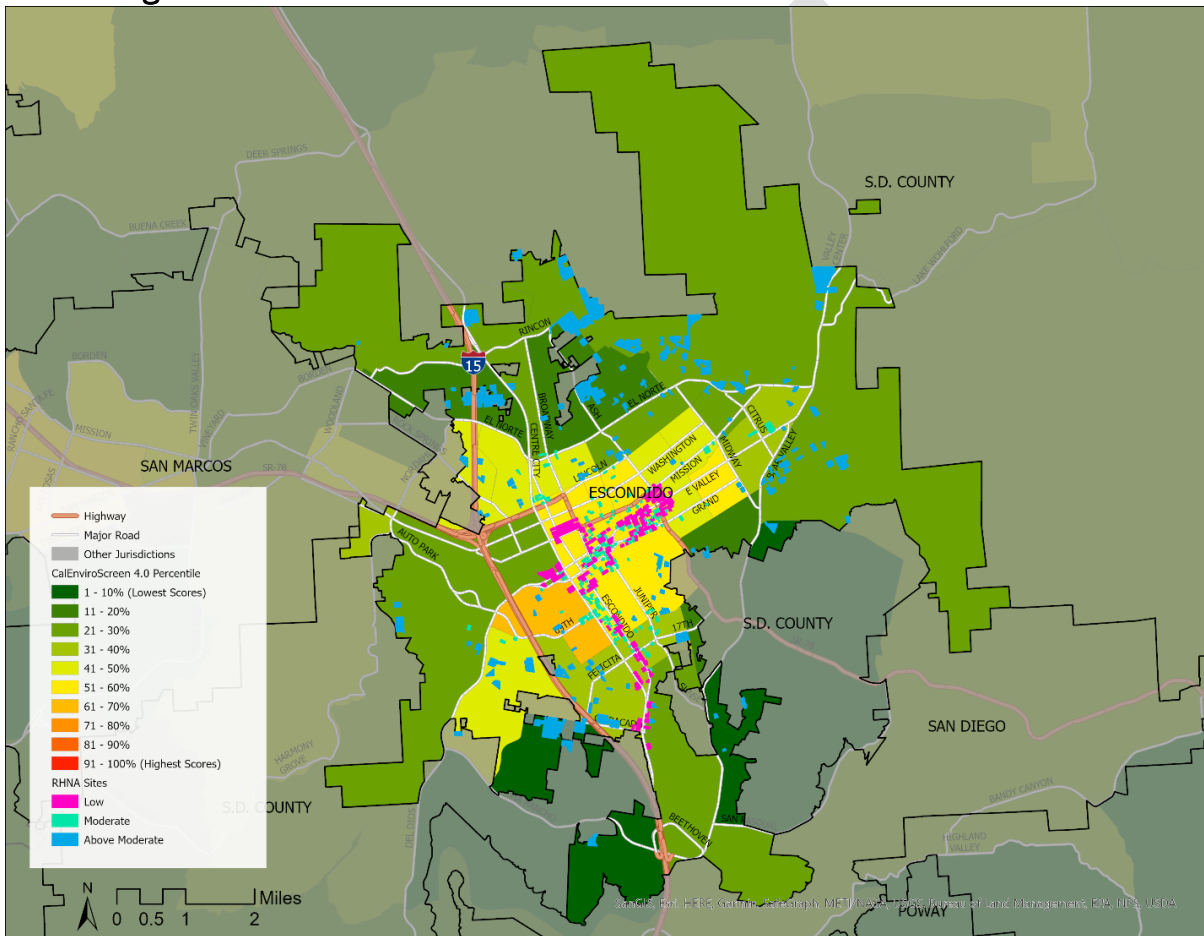
Table E-69: Location of Sites by TCAC Designation	
CA TCAC Designation	Number of Units (Sites Inventory)
Moderate Resource	787
Low Resource	5,383
High Segregation and Poverty	2,339
Source: 2021 TCAC/HCD Opportunity Area Maps	

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Figure E-39 displays the RHNA sites by income allocation and CalEnviroScreen 4.0 percentile scores for the City. The accompanying chart displays the percentage of low-income RHNA units total RHNA units and City acreage that fall into each percentile group of the CES 4.0. Generally, the more rural and less populated outer areas of the City see higher CES 4.0 scores. These areas consist of open space, agriculture, and low-density housing. Over half of low-income units and total RHNA units are in the 50-60% CES 4.0 percentile.

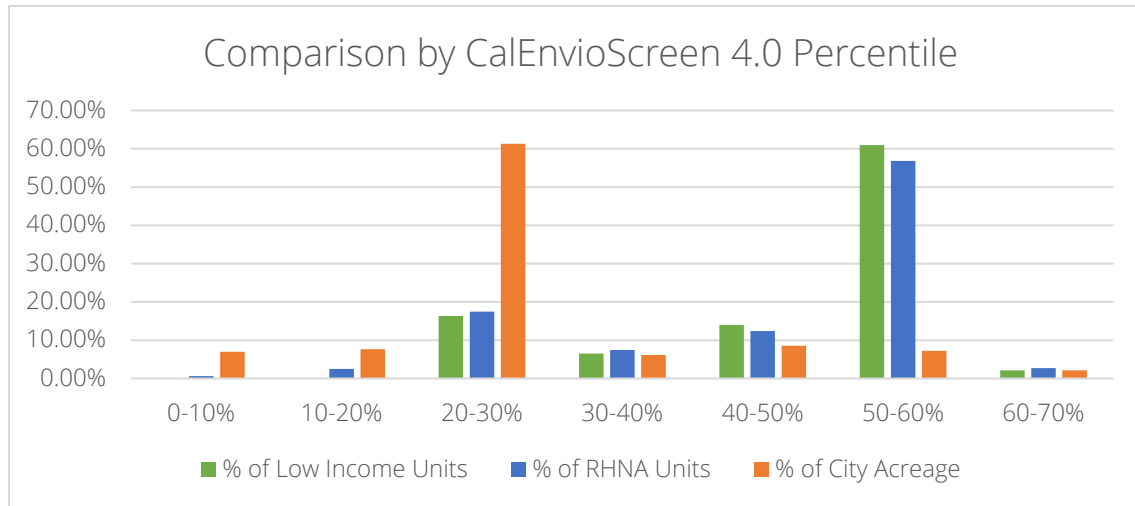
Figure E-39: RHNA Sites and CalEnviroScreen 4.0 Percentile Scores



Source: HUD AFFH Data Viewer Tool and SanGIS Data Warehouse



Figure E-40: RHNA Units and City Acreage Comparison by Cal EnviroScreen 4.0 Percentile



Source: HUD AFFH Data Viewer Tool and MBI

Improved Conditions, Exacerbated Conditions, and Other Relevant Factors

As shown by the analysis of RHNA sites, many RHNA units are located in census tracts that display trends of desegregation and integration, low opportunity scores or are designated as a R/ECAP area. Though these are clearly areas with disproportionate needs, the City is actively working to address these needs. As the City is focusing growth in these areas with disproportionate needs, the City has adopted the Downtown Specific Plan and South Centre City Specific Plan to address place-based segregation.

Through the Downtown Specific Plan, the City has upzoned the downtown area for 45-100 dwelling units per acre. The City is focusing its growth in this area, which, despite its low TCAC scores, has access to transit through the North Counter Sprinter Station, employment centers, and close proximity to civic and social resources. Increasing housing stock and affordability in these areas will provide new housing options to families of all incomes. Furthermore, new housing in downtown Escondido will help to stabilize existing rents and prevent displacement.

Additionally, the City is adopting the East Valley Specific Plan to create more access in other parts of the City while still maintaining its smart growth goals. The East Valley Specific Plan is designed to revitalize older commercial big box neighborhoods. It also allows for flexible uses and conversion of older medical office buildings after the Palomar Hospital campus is relocated.

Through the City's specific plans, programs, and other efforts, the sites inventory does not exacerbate but rather improve fair housing conditions in the City.



C. Summary of Fair Housing Issues

Regional Impediments to Fair Housing Choice

The 2020 AI concluded that the following were impediments to Fair Housing Choice in the San Diego Area. The relevance to Escondido is included below:

Impediment #1: Enforcement activities are limited. Fair housing services focus primarily on outreach and education; less emphasis is placed on enforcement.

LASSD provides fair housing services to the City of Escondido. Between 2014 and 2020, CSA served 861 Escondido residents. Records for 53 sites tested provided in the 2020 AI. The majority of complaints for fair housing discrimination reported disability (reasonable accommodation) as the basis for discrimination.

Impediment #2: People obtain information through many media forms, not limited to traditional newspaper noticing or other print forms.

A balance of new and old media needs to be found to expand access to fair housing resources and information with an increasing young adult and senior population. The City of Escondido also primarily relies on digital media and public notices to advertise fair housing events.

Impediment #3: Patterns of racial and ethnic concentration are present within particular areas of the San Diego region.

The California Fair Housing Task force found two areas of poverty and segregation in Escondido and some census block groups throughout the City had a minority concentration exceeding the County average of 50.4%. The minority population in Escondido, including all races and ethnicities other than non-Hispanic Whites, grew from 59.6% in 2010 to 64.5% according to the 2014-2018 ACS. The analysis in this Fair Housing Assessment also found patterns of racial and ethnic concentration in the City's downtown.

Impediment #4: Housing choices for special needs groups, especially persons with disabilities, are limited.

The 2020 AI reported that 23% of the applicant-households on the waiting list for Public Housing included one person with a disability and 10% were seniors. Similarly, 22% of applicants on the waiting list for Housing Choice Vouchers included one disabled member and 11% were seniors. According to the 2014-2018 ACS, 10.4% of Escondido residents experience a disability. Over 14% (21,512 persons) of Escondido residents are age 65 or over and 38% of senior residents experience a disability. There are 133 licensed residential care facilities totaling 2,918 beds located in Escondido. The City has approximately 19.1 beds per 1,000 residents, significantly



higher than the average countywide (8.4 beds per 1,000 persons). The population with disabilities is concentrated in the northwest and southern census tracts of the City.

Impediment #5: Due to the geographic disparity in terms of rents, concentrations of Housing Choice Voucher use have occurred.

Escondido received only 3 percent of Housing Choice Vouchers administered by the County. Within the City, HCV use is concentrated in the central census tracts of the City, which have the most affordable rents. However, these areas also have a concentration of poverty and minorities and limited access to opportunities compared to other areas of the City. Between 2014 and 2018, rent prices in Escondido increased by 55% for a two-bedroom apartment and nearly doubled (+98%) for a one-bedroom apartment. Rent spikes in the City during that period were significantly higher than countywide, where rent for a two-bedroom apartment increased 28% and rent for a one-bedroom apartment increased 47%. According to the 2014-2018 ACS, approximately 49% of Escondido residents were renters.

Impediment #6: Hispanics and Blacks continue to be under-represented in the homebuyer market and experienced large disparities in loan approval rates.

White residents made up the largest proportion of Escondido applicants (66.5%) and also had the highest approval rate (65.3%). Black residents experienced approval rates similar to White residents. Hispanics were approved at the lowest rates (56%). The underrepresentation of Hispanics was most prevalent in Escondido, Imperial Beach, and Vista.

Despite the presence of these concentrations and impediments, the selected inventory sites are appropriate for high-density housing due to access to public transit (two North County Sprinter stations), jobs, and other support services (County Live Well has an office on Mission Avenue, Interfaith Community Services has an office on Quince Street).

Downtown Escondido and the East Valley area are listed as Smart Growth Opportunity Areas by SANDAG. Despite the appearance of low resources, the City is investing heavily into these areas. Recently adopted and updated Specific Plans will attract investment; create new, high-quality housing meeting modern standards; create a healthier and more attractive public realm including enhanced pedestrian and bicycle mobility, new parks, and open spaces to improve resources; remediate environmental hazards; and provide a mix of housing types attractive and suitable for a broader range of households and income levels to alleviate conditions of poverty and segregation.

EXHIBIT "C"
PHG 20-0030
GENERAL PLAN TEXT AMENDMENT

SECTION 1. Amend Goal 6 of the Community Health and Services Chapter of the Escondido General Plan to read as shown below. (Text has been underlined to identify the added language. Text shall not be underlined in final adopted version.)

6. Civic Engagement Policies

GOAL 6: An engaged and informed citizenry with influence on policies and decisions at the local, state, and federal levels.

Civic Engagement Policy 6.1 Provide for the full inclusion of people of diverse cultures, backgrounds, age, gender, interests, languages, lifestyles, abilities, and socioeconomic status in programs at city facilities.

- a. Facilitate the involvement of residents, businesses and organizations in all aspects of the planning process by siting and scheduling public meetings on key issues affecting vulnerable communities and target populations (i.e. low-income and minority populations) at times and locations most convenient to vulnerable communities and target populations.
- b. Utilize culturally appropriate approaches to public participation and involvement and, as appropriate, make outreach material available via different platforms and in formats that are understandable by all residents, including non-English readers.

Civic Engagement Policy 6.2 Promote recreation and library programming, special events and venues, and educational opportunities which honor, interpret, and celebrate the diversity, history, cultural heritage, and traditions of Escondido.

Civic Engagement Policy 6.3 Encourage citizen volunteerism and participation in city events, commissions, boards and committees.

Civic Engagement Policy 6.4 Support developers' efforts to initiate early and frequent communication with the community regarding project proposals.

Civic Engagement Policy 6.5 Collaborate with neighborhood associations and other similar organizations to address issues of concern in neighborhoods.

Civic Engagement Policy 6.6 Promote efforts that increase rates of participation in community events such as voting, youth activities, adult education, senior activities and family-oriented programs.

Civic Engagement Policy 6.7 Distribute information about community events to a wide range of community organizations such as churches, senior facilities, and schools using existing city-sponsored platforms (e.g., city website and public access television).

Civic Engagement Policy 6.8 Support efforts to raise the public's awareness of the importance of social equity and environmental justice.

Civic Engagement Policy 6.9 Ensure that affected residents have the opportunity to participate in decisions that impact their health.

EXHIBIT "D"
**THIRD ADDENDUM TO THE FINAL CERTIFIED
ESCONDIDO GENERAL PLAN UPDATE, DOWNTOWN SPECIFIC PLAN UPDATE, AND
CLIMATE ACTION PLAN ENVIRONMENTAL IMPACT REPORT (SCH #2010071064)
TO AMEND THE GENERAL PLAN AND ADOPT
THE 2021-2029 HOUSING ELEMENT UPDATE; AND COMMUNITY HEALTH AND SERVICE
CHAPTER UPDATE**

EXECUTIVE SUMMARY

Purpose and Background

This Third Addendum to the Final Certified Escondido General Plan Update, Downtown Specific Plan Update, and Climate Action Plan Environmental Impact Report ("Addendum") has been prepared by the City of Escondido ("City") in conformance with the California Environmental Quality Act (Public Resources Code section 21000 et seq.) ("CEQA"), the regulations promulgated thereunder (14 California Code of Regulations section 15000 et seq.) ("CEQA Guidelines"), and the City's Environmental Review Guidelines (Article 47 of the Escondido Zoning Code) to amend the General Plan, consisting of the following (collectively referred to herein as the "Project"):

1. A General Plan amendment to update the City of Escondido's Housing Element for the 6th Cycle planning period from April 15, 2021 to April 15, 2029. The Housing Element, which is part of the City's General Plan, is a policy document designed to provide the City a coordinated and comprehensive strategy for promoting the production of safe, decent, and affordable housing within the community. The City is able to meet its fair share of regional housing needs assessment requirement without any changes to General Plan designations or densities allowed. Therefore, the 2021-2029 Housing Element is consistent with the basic planning assumptions that were utilized to prepare the 2013-2021 Housing Element. Approving the Project would repeal in its entirety the 2013-2021 Housing Element and adopting in full new text, graphics, and figures comprising the 2021-2029 Housing Element to the General Plan.
2. A General Plan text amendment to update the Community Health and Services Chapter. As part of its effort to address environmental justice goals, policies, and objectives, Civic Engagement goals in the Community Health and Services Chapter of the General Plan are being amended to include additional policies to expand outreach efforts to disadvantaged communities and target populations, particularly on issues that relate to social equity and health. Increased civic engagement provides a diverse perspective to inform future city policy and thus relates to all elements of the General Plan. Increased civic engagement in and of itself is therefore consistent with all other elements of the General Plan.

The purpose of this Addendum is to provide updated information to the Final Certified Escondido General Plan Update, Downtown Specific Plan Update, and Climate Action Plan Environmental Impact Report ("Final EIR"). Section 15164(a) of the CEQA Guidelines states that "[t]he lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred." Section 15162 of the CEQA Guidelines provides that a subsequent EIR is required when (1) substantial changes are proposed in the project or circumstances that will require major revisions of the prior EIR due to new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or (2) new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the prior EIR was certified, shows that (a) the project will have one or more significant effects not discussed in the prior EIR, (b) significant effects previously examined will be substantially more severe than shown in the prior EIR, (c) mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project but the project proponents decline to adopt the mitigation measure or alternative, or (d) mitigation measures or alternatives that are considerably different from those analyzed in the prior EIR would substantially reduce one or more significant effects on the environment but the project proponents decline to adopt the mitigation measure or alternative.

As discussed in the following sections, the new information and minor technical modifications are not considered "significant" pursuant to CEQA. Specifically, the Addendum to the Final EIR finds that the impacts resulting from implementation of the 2012 General Plan Update and the Climate Action Plan as described in the Final EIR, as well as the Downtown Specific Plan Update, remain the same, aside from the Project's proposed modification, and the mitigation measures would remain unchanged and are still valid and enforceable. No considerably different mitigation measures or feasible alternatives have been identified. The Addendum to the Final EIR finds that the previously identified impacts and mitigation measures, as described in the Final EIR, are still applicable to the updated General Plan. Therefore, the Final EIR, as certified, remains adequate and complete. The Housing Element is one of the mandatory elements of the General Plan and is required by State law to be updated for the 2021-2029 planning period (also called the 6th Cycle planning period). State law requires the Public Safety Element, which is another mandatory element of the General Plan, to be updated upon revision of the Housing Element.

The City of Escondido has prepared an update to the Housing Element to include an analysis required by State law related to: 1) existing demographics and housing characteristics; 2) market, government, and environmental constraints; 3) land, financial, and administrative resources available to meet housing demand; 4) establishment of goals and policies to address housing needs; and 5) a review of past accomplishments under the 2013-2021 Housing Element. The City is able to meet its fair share or regional housing needs without any changes to General Plan designations or densities allowed. Revised policies are included in the 2021-2029 Housing Element Update, updating existing major strategies and policies from the 2013-2021 Housing Element, prepared for the 5th Cycle planning period.

The Safety Element, which is called the Community Protection Chapter in the 2012 Escondido General Plan, addresses potential and existing hazards in the City, which are outlined in the following categories: Emergency Preparedness, Geological Hazards/Seismic Activity, Flood Hazards, Hazardous Material and Mining Hazards, Public Safety Services and Facilities, Fire Hazards and Protection, and Severe Weather Hazards. Among other updates, additional categories for Climate Change Resiliency and Mitigation must be added. These updates will be incorporated into a future General Plan amendment and are not part of this Project.

In addition, the City is also required by Government Code section 65302(h) to include environmental justice goals, policies, and objectives in the General Plan when two or more elements of the General Plan are updated concurrently. Environmental justice is defined by the State of California as the "fair treatment and meaningful involvement of people of all races, cultures, incomes, and national origins with respect to the development, adoption, implementation, and enforcement of laws, regulations, and policies" (California Government Code section 65040.12(e)). Inclusion of these goals, policies, and objectives may be accomplished through adoption of an Environmental Justice Element, or integration of related goals, policies, and objectives into other elements. Upon approval of the Project, certain environmental justice goals and policies will be integrated into the City's Community Health and Services Chapter. Additional environmental justice goals, policies, and objectives will be integrated into the Community Protection Chapter in a future General Plan amendment.

All such draft strategies and policies build upon, augment, or refine existing strategies and policies of the current General Plan, and they introduce no new policies that would conflict with existing General Plan elements having the most direct relation to allowable use and development, such as land use, circulation, or safety element policies. Similarly, the 2021-2029 Housing Element did not eliminate any existing strategies for its programmatic approach to housing. Therefore, the Project may be approved as an activity covered within the scope of the Final EIR.

All other environmental analysis sections are not contained herein because the original Final EIR for those environmental areas are still applicable and do not require updated information. CEQA does not require that the original Final EIR be circulated with the Addendum, but the original Final EIR is available for public review from the City of Escondido upon request. Therefore, please refer to the original Final EIR for other environmental topics not contained in this Addendum.

1.0 Introduction

This section provides information related to CEQA and the revised analysis to the Final EIR, as it relates to the Housing Element Update. This section discusses the original Final EIR (SCH #2010071064), which was certified in 2012. This section provides background information on the need to provide updated information to the original analysis in reference to the General Plan amendment.

1.1 Project Description:

Pursuant to Government Code section 65583, a Housing Element is required to consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. Specifically, a Housing Element is required to contain the following:

- An assessment of housing needs and an inventory of resources and constraints relevant to the meeting of these needs (Government Code section 65583(a));
- A statement of the community's goals, quantified objectives, and policies relative to the maintenance, preservation, improvement, and development of housing (Government Code section 65583(a)); and
- A program that sets forth a schedule of actions during the planning period, each with a timeline for implementation of the policies and achieve the goals and objectives of the housing element (Government Code section 65583(c)).

The proposed draft 2021-2029 Housing Element consists of the following major components:

- A profile and analysis of the City's demographics, housing characteristics, and existing and future housing needs.
- A review of the real or potential constraints to housing production and preservation. Constraints include potential market, governmental, policy, and environmental limitations to meeting the City's identified housing needs.
- An assessment of resources available to meet the City's objectives regarding housing production and preservation.
- Strategies to address the City's identified housing needs, including housing goals, policies, and programs, including changing housing needs, including preparation of a Regional Housing Needs Allocation ("RHNA") plan (Government Code section 65584(a)).

A critical measure of compliance with Housing Element Law is the ability of a jurisdiction to accommodate its share of the regional housing needs based on a RHNA prepared by HCD for each Council of Governments in the state that identifies projected housing units needed for all economic segments based on Department of Finance population estimates. The San Diego Association of Governments ("SANDAG") is the Council of Governments for the San Diego region and allocates to the 18 cities and the unincorporated area of San Diego County their fair share of the total RHNA housing needed for each income category. Overall, the region needs to plan for an additional 171,685 units. The City's share of the regional housing need for the 2021-2029 RHNA period is allocated by SANDAG based on several factors, including recent growth trends, income distribution, and capacity for future growth. Each local government must demonstrate that it has planned to accommodate all its regional housing need allocation in its Housing Element. Escondido's share of regional future housing needs is a total of 9,607 new units for the period of April 15, 2021, to April 15, 2029. This allocation is divided into various income categories, of which 3,113 new units must be reserved for households in the low- and very low-income category. The overall RHNA allocation process reflects a need for cooperation between both public and private sectors to expand housing opportunities that will allow for new housing development that

benefits everyone in the community, such as a greater mix of housing types and choices. It allows local governments to maintain control over where and what type of development should occur in their communities, while allowing the private sector to meet market demand. While the Housing Element must contain a variety of community statistics to frame future housing needs, pursuant to Government Code section 65583, all cities must accommodate their RHNA allocations in their Housing Elements by adopting land use plans that accommodate the minimum amounts of housing unit goals and RHNA allocations.

Housing Element Law requires that jurisdictions demonstrate in the Housing Element that the land inventory is adequate to accommodate that jurisdiction's share. A jurisdiction may meet the RHNA requirement using potential development on suitable vacant and/or non-vacant sites within the community. A jurisdiction must document how zoning and development standards on the proposed sites facilitate housing to accommodate the remaining RHNA requirement. Government Code section 65863(c) requires the City to identify available sites for the rezone, in order to satisfy its RHNA obligations, but also contains procedures for the City to follow in the event that a site becomes unavailable. To ensure that the City monitors its compliance with SB 166 ("No Net Loss"), the City will monitor the consumption of residential acreage to verify an adequate inventory is available to meet the City's RHNA obligations. To ensure sufficient residential capacity is maintained to accommodate the RHNA, the City will develop and implement a formal ongoing (project-by-project) evaluation procedure pursuant to Government Code section 65863. If an approval of development results in a reduction of capacity below the residential capacity needed to accommodate the remaining need for lower income households, the City will identify (and, if necessary, rezone) sufficient sites to accommodate the shortfall and ensure "no net loss" in capacity to accommodate the RHNA. The City will maintain an inventory of available sites for residential development and provide it to prospective residential developers upon request. The parcel-by-parcel inventory is located in the Sites Inventory Appendix of the Housing Element.

Community Health and Services Chapter

SB 1000 (2016) requires cities and counties to integrate environmental justice goals, policies, and objectives into the General Plan upon the concurrent update to two or more elements. Although the Project only includes an update to the Housing Element, that update also requires the Safety Element to be updated, which will occur in the coming months. The proposed General Plan text amendment to the Community Health and Safety Chapter (optional element to the General Plan) directly relates to topics mandated for the environmental justice policies of the General Plan. Environmental justice goals are achieved when everyone in the City has the same degree of protection from environmental and health hazards; a healthy environment in which to live, learn, and work; and equal access to the decision-making process. Environmental justice policies will be aimed at reducing health risks, promoting civic engagement, and prioritizing the needs of disadvantaged communities with implementable actions that achieve them.

1.1 California Environmental Quality Act:

CEQA requires that state and local government agencies consider the environmental consequences of projects over which they have discretionary authority before taking action on those projects (Public Resources Code sections 21000 et seq.). CEQA also requires that each

public agency mitigate or avoid, wherever feasible, the significant environmental impacts of a project that it approves or implements. A significant impact is one that would lead to a substantial adverse change in the physical conditions of the environmental areas affected by the project.

An EIR is an informational document used in state, regional, and local planning and decision-making processes to meet the requirements of CEQA. The EIR for a proposed project must disclose environmental effects that cannot be avoided; growth-inducing effects; effects found not to be significant; and significant cumulative impacts of all past, present and reasonably anticipated future projects. In addition, an EIR must identify potential methods of avoiding or reducing effects (i.e., mitigation measures) and alternatives to the proposed project or program

1.2 Final EIR for the 2012 General Plan Update, Downtown Specific Plan Update, and Climate Action Plan:

The Final EIR addresses a full range of environmental issues associated with the 20-year planning horizon of the 2012 General Plan (2035). The Final EIR was certified on May 23, 2012, by the Escondido City Council (Resolution No. 2012-53.) A Mitigation Monitoring and Reporting Program ("MMRP"); Findings of Fact including significant and unavoidable air quality, biological resources, noise, vibration, housing, traffic, and utilities impacts; and a Statement of Overriding Considerations were also adopted at the same public hearing.

The Addendum constitutes the third addendum to the Final EIR. The first addendum to the Final EIR was prepared for the Downtown Specific Plan Density Transfer Program, which was adopted by City Council Resolution 08-62 on August 19, 2008. The second addendum to the Final EIR was prepared for the Downtown Specific Plan amendment to address and remove ground-floor retail requirements; which as of this writing has not been reviewed or considered for adoption by the City Council.

1.3 Lead Agency and Discretionary Approvals:

This Addendum documents the City's consideration of the potential environmental impacts resulting from the change in the project and explains the City's decision that a subsequent EIR is not required. The City of Escondido is the lead agency and has approval authority over the Project and changes.

1.4 Documents Incorporated by Reference:

CEQA Guidelines section 1510 authorizes agencies to incorporate by reference other documents that provide relevant data and analysis into their environmental documents. The following documents are hereby incorporated by reference within this Addendum, and all of these documents are considered part of the Final EIR.

- Draft Environmental Impact Report – City of Escondido General Plan Update, Specific Plan Update, and Climate Action Plan, Draft Environmental Impact Report, State

Clearinghouse #2010071064, prepared for the City of Escondido, by Atkins, dated January 10, 2012.

- Draft Environmental Impact Report – City of Escondido General Plan Update, Specific Plan Update, and Climate Action Plan, Draft Environmental Impact Report, State Clearinghouse #2010071064, prepared for the City of Escondido, by Atkins, dated April 23, 2012.
- An Addendum to the previously adopted EIR for 2012 General Plan Update, Downtown Specific Plan Update, and Climate Action Plan, prepared for the City of Escondido, by Harris & Associates, dated March 1, 2019.

1.5 Document Availability:

The Office of the City Clerk is the custodian of the administrative record for the Final EIR. The administrative record is available for public review during normal business hours.

1.6 CEQA Requirements for Use of an Addendum:

Section 15160 of the CEQA Guidelines explains that there are several mechanisms and variations in environmental documents that can be tailored to different situations and intended uses of environmental review. These variations, including Subsequent EIRs, Supplemental EIRs, and Addenda, are not exclusive. "Lead agencies may use other variations consistent with the guidelines to meet the needs of other circumstances." (CEQA Guidelines § 15160.)

Public Resources Code section 21166 sets the standard to determine whether another EIR should be prepared when an original EIR has been prepared. Section 21166 states:

When an environmental impact report has been prepared for a project pursuant to this division, no subsequent or supplemental environmental impact report shall be required by the lead agency or by any responsible agency, unless one or more of the following events occurs:

(a) Substantial changes are proposed in the project which will require major revisions of the environmental impact report.

(b) Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report.

(c) New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available.

Similarly, CEQA Guidelines section 15162 states:

(a) When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

(2) Substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(3) New information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:

(A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

(b) If changes to a project or its circumstances occur or new information becomes available after adoption of a negative declaration, the lead agency shall prepare a subsequent EIR if required under subsection (a). Otherwise, the lead agency shall determine whether to prepare a subsequent negative declaration, an addendum, or no further documentation.

(c) Once a project has been approved, the lead agency's role in project approval is completed, unless further discretionary approval on that project is required. Information

appearing after an approval does not require reopening that approval. If after the project is approved, any of the conditions described in subsection (a) occurs, a subsequent EIR or negative declaration shall only be prepared by the public agency which grants the next discretionary approval for the project, if any. In this situation no other Responsible Agency shall grant an approval for the project until the subsequent EIR has been certified or subsequent negative declaration adopted.

(d) A subsequent EIR or subsequent negative declaration shall be given the same notice and public review as required under Section 15087 or Section 15072. A subsequent EIR or negative declaration shall state where the previous document is available and can be reviewed.

Thus, CEQA Guidelines section 15162 clarifies that a subsequent EIR or supplemental EIR is only required when "substantial changes" occur to a project or the circumstances surrounding a project, or "new information" about a project implicates "new significant environmental effects" or a "substantial increase in the severity of previously significant effects." In evaluating whether these thresholds are met, the key is to determine if any circumstances have changed enough to justify repeating a substantial portion of the environmental documentation process. If conditions do not justify a new or supplemental EIR, but minor additional or technical changes are appropriate to keep the document current and useful, an agency may prepare an addendum. (CEQA Guidelines § 15164).

Specifically, CEQA Guidelines section 15164 states:

(a) The lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred

(b) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.

(c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.

(d) The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.

(e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's required findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

Here, the City has opted to prepare an Addendum to assess the minor modifications of the Project that have transpired since preparation of the Final EIR. This Addendum will document the character of any changes or additions to support the determination to prepare an Addendum. It will also provide an opportunity to evaluate all components of section 15162 to determine if the Final EIR still reflects the full scope of the environmental impact. Where appropriate, citations to the Final EIR will be made, and assumptions made in the Final EIR will be evaluated for continuing validity.

1.7 Summary of Analysis and Findings:

Based upon the supporting checklist responses (Section 2), other than the minor changes to the Project in reference to map changes and text changes, the environmental effects associated with the changes in the Project do not require additional analysis beyond the analysis previously prepared and distributed in the Final EIR.

Pursuant to CEQA Guidelines section 15164, the City of Escondido finds that only minor modifications are required and that none of the conditions described in Public Resources Code section 21166 or CEQA Guidelines section 15162 requiring preparation of a subsequent or supplemental EIR have occurred. More specifically, the City of Escondido has determined all of the following:

- There are no substantial changes to the Project that would require major revisions of the Final EIR due to new significant environmental effects or a substantial increase in the severity of impacts identified in the previous Final EIR.
- No substantial changes have occurred in the circumstances under which the project is being undertaken that will require major revisions of the Final EIR to disclose new significant environmental effects or that would result in a substantial increase in the severity of the impacts identified in the Final EIR.
- There is no new information of substantial importance, which was not known at the time that the previous Certified Final EIR for the proposed Project was circulated, indicating that:
 - The Project will not have one or more significant effects not previously discussed in the Certified Final EIR;
 - There are no impacts that were determined to be significant in the previous Certified Final EIR that would be substantially more severe.
 - There are no additional mitigation measures or alternatives to the project that would substantially reduce one or more of the significant effects identified in the previous Certified Final EIR; and
 - There are no additional mitigation measures or alternatives which were rejected that are considerably different from those analyzed in the previous Certified Final EIR that would substantially reduce any significant impact identified in the Certified Final EIR.

2.0 Environmental Analysis

This section of the Addendum analyzes the potential environmental effects associated with the implementation of the Specific Plan Amendment to address the ground-floor retail requirement as compared to the environmental analysis provided in the Final EIR. Each environmental topic is organized first to identify the impacts and significance level determinations previously identified in the Final EIR, second to identify the impacts of the Project and whether new or increased severity of significant impacts would occur, and third to evaluate whether the Project would result in substantial changes in the circumstances or new information not previously identified in the Final EIR. This section provides substantial evidence to support the findings and basis to prepare the Addendum, which is that the Project would not create substantial changes, or bring to light new information of substantial importance that was not previously examined in the Final EIR, that would trigger the preparation of a subsequent or supplemental EIR as set forth in CEQA Guidelines sections 15162 and 15163. As such, the Addendum is consistent with the provisions of CEQA Guidelines section 15164 because only minor changes and additions to the Final EIR are necessary to address the project.

2.1 Aesthetics:

The Final EIR previously identified the following impacts associated with aesthetics and determined the corresponding level of significance.

Issue 4.1-1 Scenic Vistas (Less than Significant)

Issue 4.1-2 Scenic Resources (Less than Significant)

Issue 4.1-3 Visual Character or Quality (Less than Significant)

Issue 4.1-4 Light or Glare (Less than Significant)

These less than significant impacts were addressed in Section 4.1, Aesthetics, of the Final EIR, on pages 4.1-1 through 4.1-50 under the headings noted above.

The Project seeks to amend the Housing Element portion of the General Plan to meet the statutory requirements of Housing Element Law, as it was described previously in the Final EIR. The 2021-2029 Housing Element Update is a policy document and its adoption would not, in itself, produce environmental impacts. It consists of a housing program that was updated to reflect current conditions and legal requirements; no actual development is proposed as part of the Housing Element Update. However, implementation of the programs contained in the document would accommodate development required to meet the City's regional housing needs assessment, which specifies a need for land appropriately zoned to facilitate the production of new housing. Although the City does not build the housing, the Housing Element does create a plan and

regulatory framework, which provides opportunities for the private sector to do so, where market conditions determine when and where housing is built.

The City's update to the Community Health and Services Chapter to integrate certain environmental justice policies, goals, and objectives, will identify issues and needs anticipated to be of ongoing concern to people in the City. Environmental justice goals, policies, and objectives will be developed by identifying disadvantaged communities and demographics to better understand the unique and disproportionate challenges faced by these communities. This will guide the City's efforts to address issues related to public health, social equity, and environmental justice.

New land use development projects would implement the proposed Housing Element Update goals and policy text changes. Those future projects would be subject to future environmental review, as required under CEQA, once sufficient information is available to complete such review. All future projects would be required to adhere to relevant development standards and design guidelines contained in the City's zoning ordinance. The potential impacts of any specific future residential development projects would be assessed at the time when the projects are actually proposed, and mitigation measures would be adopted as necessary, in conformance with CEQA.

As described in the Final EIR Section 4.1, Aesthetics, Issues 4.1-1, 4.1-2, 4.1-3, and 4.1-4 would result in less than significant impacts resulting from the implementation of the Escondido General Plan Update ("GP 2012 Update"), Downtown Specific Plan Update ("DSP Update"), and the Escondido Climate Action Plan ("E-CAP"). Implementation of the GP 2012 Update, DSP Update, and E-CAP would not obstruct existing views and resources by complying with existing regulations and the proposed GP 2012 Update and DSP Update policies. Implementation of the City's Grading and Erosion Ordinance and General Plan update policies in the Resource Conservation Element would protect views of ridgelines by requiring development to comply with grading design guidelines for development on all steep slopes, requiring slope analyses and visual analyses for development near skyline ridges, and prohibiting development on skyline ridges. Implementation of the GP 2012, DSP Update, and E-CAP, would have the potential to change the existing visual character or quality in some areas of the City, but not degrade it. Development consistent with the GP 2012 Update and DSP Update would be high quality development designed to be compatible with existing adjacent land uses. Additionally, there would not be substantial impacts in regards to lighting or glare, as all new development would be required to comply with the City's outdoor lighting ordinance. Also, the GP 2012 Update and DSP Update include policies that require new development, including development that would install reflective surfaces as part of the E-CAP implementation, to avoid light and glare impacts, including spillover light and incompatible glare. Therefore, impacts to Issues 4.1-1 through 4.1-4 would be less than significant. Based on the above discussion, the Project is not expected to result in new or more severe impacts to aesthetics. Refer to the Final EIR for the original environmental analysis for aesthetics.

2.2 Agricultural Resources:

The Final EIR previously identified the following impacts associated with agricultural resources and determined the corresponding level of significance.

Issue 4.2-1 Conversion of Agricultural Resources (Less than Significant)

Issue 4.2-2 Land Use Conflicts (Less than Significant)

Issue 4.2-3 Indirect Conversion of Agricultural Resources

These less than significant impacts were addressed in Section 4.2, Agricultural Resources, of the Final EIR on pages 4.2-1 through 4.2-28 under the headings noted above.

The Project seeks to amend the Housing Element portion of the General Plan to meet the statutory requirements of Housing Element Law, as it was described previously in the Final EIR. The 2021-2029 Housing Element Update is a policy document and its adoption would not, in itself, produce environmental impacts. It consists of a housing program that was updated to reflect current conditions and legal requirements; no actual development is proposed as part of the Housing Element Update. However, implementation of the programs contained in the document would accommodate development required to meet the City's regional housing needs assessment, which specifies a need for land appropriately zoned to facilitate the production of new housing. Although the City does not build the housing, the Housing Element does create a plan and regulatory framework, which provides opportunities for the private sector to do so, where market conditions determine when and where housing is built.

The City's update to the Community Health and Services Chapter to integrate certain environmental justice policies, goals, and objectives, will identify issues and needs anticipated to be of ongoing concern to people in the City. Environmental justice goals, policies, and objectives will be developed by identifying disadvantaged communities and demographics to better understand the unique and disproportionate challenges faced by these communities. This will guide the City's efforts to address issues related to public health, social equity, and environmental justice.

New land use development projects would implement the proposed Housing Element Update goals and policy text changes. Those future projects would be subject to future environmental review, as required under CEQA, once sufficient information is available to complete such review. All future projects would be required to adhere to relevant development standards and design guidelines contained in the City's zoning ordinance. The potential impacts of any specific future residential development projects would be assessed at the time when the projects are actually proposed, and mitigation measures would be adopted as necessary, in conformance with CEQA.

As described in the Final EIR Section 4.2, Agricultural Resources, Issues 4.2-1, 4.2-2, and 4.2-3 would result in less than significant impacts resulting from the implementation of the GP 2012 Update, DSP Update, and the E-CAP. Implementation of the GP 2012 Update would result in the potential direct conversion of 1,846 acres of agricultural resources. However, the GP 2012 update

provides multiple policies within various elements that promote preservation and encourage agricultural uses within the City. The E-CAP provides reduction measures that encourage agricultural efficiencies. Additionally, zoning designations would be made consistent with the GP land use designations with the adoption of the GP 2012 Update and would not impact any land under an existing Williamson Act Contract. Implementation of the GP 2012 Update policies and smart growth planning strategies would reduce the potential for agricultural resources to be converted to non-agricultural uses. Therefore, impacts would be less than significant under Issues 4.2-1, 4.2-2, and 4.2-3.

2.3 Air Quality:

The Final EIR previously identified the following impacts associated with air quality and determined the corresponding level of significance.

Issue 4.3-1 Air Quality Plans (Less than Significant)

Issue 4.3-2 Air Quality Violations – Direct and Cumulative (Significant and Unavoidable)

Issue 4.3-3 Sensitive Receptors (Less than Significant with Mitigation)

Issue 4.3-4 Objectionable Odors (Less than Significant)

These issues were addressed in Section 4.3, Air Quality, of the Final EIR on pages 4.3-1 through 4.3-40 under the headings noted above.

The Project seeks to amend the Housing Element portion of the General Plan to meet the statutory requirements of Housing Element Law, as it was described previously in the Final EIR. The 2021-2029 Housing Element Update is a policy document and its adoption would not, in itself, produce environmental impacts. It consists of a housing program that was updated to reflect current conditions and legal requirements; no actual development is proposed as part of the Housing Element Update. However, implementation of the programs contained in the document would accommodate development required to meet the City's regional housing needs assessment, which specifies a need for land appropriately zoned to facilitate the production of new housing. Although the City does not build the housing, the Housing Element does create a plan and regulatory framework, which provides opportunities for the private sector to do so, where market conditions determine when and where housing is built.

The City's update to the Community Health and Services Chapter to integrate certain environmental justice policies, goals, and objectives, will identify issues and needs anticipated to be of ongoing concern to people in the City. Environmental justice goals, policies, and objectives will be developed by identifying disadvantaged communities and demographics to better understand the unique and disproportionate challenges faced by these communities. This will guide the City's efforts to address issues related to public health, social equity, and environmental justice.

New land use development projects would implement the proposed Housing Element Update goals and policy text changes. Those future projects would be subject to future environmental review, as required under CEQA, once sufficient information is available to complete such review. All future projects would be required to adhere to relevant development standards and design guidelines contained in the City's zoning ordinance. The potential impacts of any specific future residential development projects would be assessed at the time when the projects are actually proposed, and mitigation measures would be adopted as necessary, in conformance with CEQA.

As described in the Final EIR Section 4.3, Air Quality, implementation of the GP 2012 Update, DSP Update, and the E-CAP is consistent with the SANDAG projections accounted for in the Regional Air Quality Strategy ("RAQS") and the State Implementation Plan ("SIP"). Future development would be required to demonstrate compliance with the strategies and measures adopted as part of the RAQS and SIP during the City's environmental review process, as well as with the requirements of the City and/or the San Diego Pollution Control District ("SDAPCD") to reduce emissions of particulate matter. Therefore, impacts would be less than significant under Issue 4.3-1.

Annual construction emissions and operational emissions associated with future development under the GP 2012 Update would result in significant emissions of volatile organic carbons ("VOCs"), particulate matter 10 ("PM10"), and PM2.5. Realistically, yearly construction emissions for all pollutants may be greater or lower depending on how development is implemented. Future development under the GP 2012 Update would be required to comply with CARB motor vehicle standards, SDAPCD regulations from stationary sources and architectural coatings, and the GP 2012 Update goals and policies. Additionally, the San Diego Air Basin ("SDAB") is a nonattainment area for the state standards for ozone, PM10, and PM2.5. Therefore, with the implementation of the GP 2012 Update, DSP Update, and E-CAP, there would be a cumulatively considerable impact for these pollutants. Mitigation measures Air-1 and Air-2 would be incorporated to mitigate these effects. While these measures and policies are intended to reduce impacts associated with air quality violations, these measures cannot guarantee that emissions would be reduced to a less than significant level. Therefore, even with the implementation of mitigation, impacts from construction and operation would remain significant and unavoidable under Issue 4.3-2.

Future development consistent with the GP 2012 Update, DSP Update, and E-CAP, would result in potentially significant emissions of diesel particulate matter ("DPM") and toxic air contaminants ("TACs"). Land development projects are required to comply with AB 2588, SDAPCD RULE 1210, Toxic Air Contaminant Public Health Risks – Public Notification and Risk Reduction, and CARB standards for diesel engines. The GP 2012 Update Air Quality and Climate Protection Element requires future land uses to be sited according to CARB recommendations. However, CARB does not make specific recommendations for certain potential sources of TACS including waste transfer, industrial, medical, and research and development facilities. Incorporation of mitigation measures Air-3 and Air-4 would reduce potential impacts associated with exposure of sensitive receptors to TACs to less than significant under Issue 4.3-3.

While odor sources are present within the GP 2012 Update and DSP Update planning areas, compliance with SDAPCD Rule 51 and the GP Update 2012 would ensure that a substantial number of sensitive receptors would not be exposed to objectionable odors. Therefore, impacts would be less than significant under Issue 4.3-4.

2.4 Biological Resources:

The Final EIR previously identified the following impacts associated with biological resources and determined the corresponding level of significance.

Issue 4.4-1 Special Status Species – Cumulative (Significant and Unavoidable)

Issue 4.4-2 Riparian Habitat and Other Sensitive Natural Communities – Cumulative (Significant and Unavoidable)

Issue 4.4-3 Federally Protected Wetlands (Less than Significant)

Issue 4.4-4 Wildlife Movement Corridors – Cumulative (Significant and Unavoidable)

Issue 4.4-5 Local Policies and Ordinances (Less than Significant)

Issue 4.4-6 Habitat Conservation Plans and Natural Community Conservation Plans (Less than Significant)

These issues were addressed in Section 4.4, Biological Resources, of the Final EIR on pages 4.41 through 4.4-40 under the headings noted above.

The Project seeks to amend the Housing Element portion of the General Plan to meet the statutory requirements of Housing Element Law, as it was described previously in the Final EIR. The 2021-2029 Housing Element Update is a policy document and its adoption would not, in itself, produce environmental impacts. It consists of a housing program that was updated to reflect current conditions and legal requirements; no actual development is proposed as part of the Housing Element Update. However, implementation of the programs contained in the document would accommodate development required to meet the City's regional housing needs assessment, which specifies a need for land appropriately zoned to facilitate the production of new housing. Although the City does not build the housing, the Housing Element does create a plan and regulatory framework, which provides opportunities for the private sector to do so, where market conditions determine when and where housing is built.

The City's update to the Community Health and Services Chapter to integrate certain environmental justice policies, goals, and objectives, will identify issues and needs anticipated to be of ongoing concern to people in the City. Environmental justice goals, policies, and objectives will be developed by identifying disadvantaged communities and demographics to better

understand the unique and disproportionate challenges faced by these communities. This will guide the City's efforts to address issues related to public health, social equity, and environmental justice.

New land use development projects would implement the proposed Housing Element Update goals and policy text changes. Those future projects would be subject to future environmental review, as required under CEQA, once sufficient information is available to complete such review. All future projects would be required to adhere to relevant development standards and design guidelines contained in the City's zoning ordinance. The potential impacts of any specific future residential development projects would be assessed at the time when the projects are actually proposed, and mitigation measures would be adopted as necessary, in conformance with CEQA.

As described in the Final EIR Section 4.4, Biological Resources, implementation of the GP 2012 Update, DSP Update, and the E-CAP would have the potential to result in direct and indirect impacts to special status plant and wildlife species and their habitats, riparian habitats, sensitive communities, wildlife corridors, and native wildlife nursery sites. Existing federal and state regulations and land use agreements prohibit the take of sensitive species without permitting from wildlife and limit the amount of habitat that can be impacted by new development. The goals and policies of the GP 2012 Update included in the Resource Conservation Element, Community Health and Services Element, and Land Use and Community Form Element require projects with the potential to impact sensitive species to prepare a biological survey and mitigate any impacts that would occur. Appropriate mitigation is required to be determined through consultation with the wildlife agencies. Compliance with these goals and policies would lessen impacts from the GP 2012 Update, DSP Update, and the E-CAP under Issues 4.4-1, 4.4-2, and 4.4-4; however, a significant cumulative impact still exists for these issues. Adoption of the City's Multiple Habitat Conservation Program ("MHCP") Subarea Plan would establish an implementation program to protect biological resources. Until the City has adopted this plan, these impacts would be cumulatively considerable.

Implementation of the GP 2012 Update, DSP Update, and the E-CAP would have the potential to result in impacts to federal wetlands from future development. However, future development that would potentially impact a wetland would be required to obtain permitting from federal and/or state regulations. Additionally, GP 2012 Update policies included in the Resource Conservation element would ensure impacts would be less than significant under Issue 4.4-3.

Future projects under the GP 2012 Update, DSP Update, and the E-CAP would be required to comply with all applicable sections of the City's Zoning Ordinance, existing regulations, preservation agreements, and applicable habitat conservation plans and Natural Community Conservation Plans ("NCCPs") as well as policies in the GP 2012 Update. Therefore, impacts associated with conflicts with local polices and ordinances and habitat conservation plans and NCCPs would be less than significant under Issues 4.4-5 and 4.4-6.

2.5 Cultural and Paleontological Resources:

The Final EIR previously identified the following impacts associated with cultural and paleontological resources and determined the corresponding level of significance.

Issue 4.5-1 Historical Resources (Less than Significant with Mitigation)

Issue 4.5-2 Archeological Resources (Less than Significant with Mitigation)

Issue 4.5-3 Paleontological Resources (Less than Significant)

Issue 4.5-4 Human Remains (Less than Significant)

These issues were addressed in Section 4.5, Cultural and Paleontological Resources, of the Final EIR on pages 4.5-1 through 4.5-48 under the headings noted above.

The Project seeks to amend the Housing Element portion of the General Plan to meet the statutory requirements of Housing Element Law, as it was described previously in the Final EIR. The 2021-2029 Housing Element Update is a policy document and its adoption would not, in itself, produce environmental impacts. It consists of a housing program that was updated to reflect current conditions and legal requirements; no actual development is proposed as part of the Housing Element Update. However, implementation of the programs contained in the document would accommodate development required to meet the City's regional housing needs assessment, which specifies a need for land appropriately zoned to facilitate the production of new housing. Although the City does not build the housing, the Housing Element does create a plan and regulatory framework, which provides opportunities for the private sector to do so, where market conditions determine when and where housing is built.

The City's update to the Community Health and Services Chapter to integrate certain environmental justice policies, goals, and objectives, will identify issues and needs anticipated to be of ongoing concern to people in the City. Environmental justice goals, policies, and objectives will be developed by identifying disadvantaged communities and demographics to better understand the unique and disproportionate challenges faced by these communities. This will guide the City's efforts to address issues related to public health, social equity, and environmental justice.

New land use development projects would implement the proposed Housing Element Update goals and policy text changes. Those future projects would be subject to future environmental review, as required under CEQA, once sufficient information is available to complete such review. All future projects would be required to adhere to relevant development standards and design guidelines contained in the City's zoning ordinance. The potential impacts of any specific future residential development projects would be assessed at the time when the projects are actually proposed, and mitigation measures would be adopted as necessary, in conformance with CEQA.

As described in the Final EIR Section 4.5, Cultural and Paleontological Resources, implementation of the GP 2012 Update, DSP Update, and the E-CAP would have potentially significant impacts to historical and archeological resources. Future development projects would

have the potential to result in substantial adverse changes to the significance of archeological and historical resources through demolition, destruction, alteration, or structural relocation as well as disturbance of an important archeological site that contains or has the potential to contain information important to history or prehistory. While existing City and County policies and regulations and the GP 2012 Update and DSP Update goals and policies are intended to protect historical and archeological resources, the incorporation of mitigation measures Cul-1, Cul-2, Cul-3, Cul-4, Cul-5, and Cul-6 are necessary to ensure the intended protections are achieved. Therefore, with the inclusion of mitigation, impacts would be less than significant under Issues 4.5-1 and 4.5-2.

Future development under the GP 2012 Update, DSP Update, and E-CAP would have the potential to damage or destroy paleontological resources in the underlying rock units due to construction-related and earth-disturbing actions. The plan areas range from no potential to moderate potential for paleontological resources meaning it is possible for ground-disturbing activities to destroy fossil-bearing geologic formations. However, existing policies and regulations and the GP 2012 Update goals and policies (i.e. Goal 5 of the Resource Conservation Element and Policy 5.2) would protect unique paleontological resources. Therefore, impacts would be less than significant under Issue 4.5-3.

Implementation of the GP 2012 Update, DSP Update, and the E-CAP would have the potential to disturb human remains, including those located outside of formal cemeteries, due to ground disturbing activities from the development of land. However, compliance with existing federal and state policies and regulations (i.e. Health and Safety Code Section 7050.5 and Public Resources Code 5097.98) would reduce impacts associated with human remains to a level below significant under Issue 4.5-4.

2.6 Geology and Soils:

The Final EIR previously identified the following impacts associated with geology and soils and determined the corresponding level of significance.

Issue 4.6-1 Exposure to Seismic-Related Hazards (Less than Significant)

Issue 4.6-2 Soil Erosion or Topsoil Loss (Less than Significant)

Issue 4.6-3 Soil Stability (Less than Significant)

Issue 4.6-4 Expansive Soils (Less than Significant)

Issue 4.6-5 Wastewater Disposal Systems (Less than Significant)

These less than significant impacts were addressed in Section 4.6, Geology and Soils, of the Final EIR on pages 4.6-1 through 4.6-38 under the headings noted above.

The Project seeks to amend the Housing Element portion of the General Plan to meet the statutory requirements of Housing Element Law, as it was described previously in the Final EIR. The 2021-2029 Housing Element Update is a policy document and its adoption would not, in itself, produce environmental impacts. It consists of a housing program that was updated to reflect current conditions and legal requirements; no actual development is proposed as part of the Housing Element Update. However, implementation of the programs contained in the document would accommodate development required to meet the City's regional housing needs assessment, which specifies a need for land appropriately zoned to facilitate the production of new housing. Although the City does not build the housing, the Housing Element does create a plan and regulatory framework, which provides opportunities for the private sector to do so, where market conditions determine when and where housing is built.

The City's update to the Community Health and Services Chapter to integrate certain environmental justice policies, goals, and objectives, will identify issues and needs anticipated to be of ongoing concern to people in the City. Environmental justice goals, policies, and objectives will be developed by identifying disadvantaged communities and demographics to better understand the unique and disproportionate challenges faced by these communities. This will guide the City's efforts to address issues related to public health, social equity, and environmental justice.

New land use development projects would implement the proposed Housing Element Update goals and policy text changes. Those future projects would be subject to future environmental review, as required under CEQA, once sufficient information is available to complete such review. All future projects would be required to adhere to relevant development standards and design guidelines contained in the City's zoning ordinance. The potential impacts of any specific future residential development projects would be assessed at the time when the projects are actually proposed, and mitigation measures would be adopted as necessary, in conformance with CEQA.

As described in the Final EIR Section 4.6, Geology and Soils, Issues 4.6-1, 4.6-2, 4.6-3, 4.6-4, and 4.6-5 would result in less than significant impacts on geology and soils with the implementation of the GP 2012 Update, the DSP Update, and the E-CAP. The GP 2012 Update would designate land uses that would allow development to occur in areas with geologic hazards such as seismically-induced ground shaking, liquefaction, and landslides as well as impacts to topsoil, expansive soils, and wastewater disposal systems. Impacts from seismically induced fault rupture would not occur due to the lack of active fault traces in the area. Future development would be required to comply with all relevant federal and state regulations and building standards, including Seismic Design Categories E and F structural design requirements identified in the California Building Code ("CBC") and the National Pollutant Discharge Elimination System ("NPDES") to control erosion of unstable soils. The GP 2012 Update also includes multiple policies intended to reduce seismic hazards, soil erosion, landslides, expansive soils, and soils incapable of adequately supporting the use of septic tanks. Compliance with these regulations and policies would reduce potential impacts to less than significant under Issues 4.61 through 4.6-5.

2.7 Greenhouse Gas Emissions:

The Final EIR previously identified the following impacts associated with greenhouse gas emissions and determined the corresponding level of significance.

Issue 4.7-1 Compliance with AB 32 (Less than Significant)

Issue 4.7-2 Potential Effects of Global Climate Change on the Proposed General Plan Update (Less than Significant)

These less than significant impacts were addressed in Section 4.7, Greenhouse Gas Emissions, of the Final EIR on pages 4.7-1 through 4.7-30 under the headings noted above.

The Project seeks to amend the Housing Element portion of the General Plan to meet the statutory requirements of Housing Element Law, as it was described previously in the Final EIR. The 2021-2029 Housing Element Update is a policy document and its adoption would not, in itself, produce environmental impacts. It consists of a housing program that was updated to reflect current conditions and legal requirements; no actual development is proposed as part of the Housing Element Update. However, implementation of the programs contained in the document would accommodate development required to meet the City's regional housing needs assessment, which specifies a need for land appropriately zoned to facilitate the production of new housing. Although the City does not build the housing, the Housing Element does create a plan and regulatory framework, which provides opportunities for the private sector to do so, where market conditions determine when and where housing is built.

The City's update to the Community Health and Services Chapter to integrate certain environmental justice policies, goals, and objectives, will identify issues and needs anticipated to be of ongoing concern to people in the City. Environmental justice goals, policies, and objectives will be developed by identifying disadvantaged communities and demographics to better understand the unique and disproportionate challenges faced by these communities. This will guide the City's efforts to address issues related to public health, social equity, and environmental justice.

New land use development projects would implement the proposed Housing Element Update goals and policy text changes. Those future projects would be subject to future environmental review, as required under CEQA, once sufficient information is available to complete such review. All future projects would be required to adhere to relevant development standards and design guidelines contained in the City's zoning ordinance. The potential impacts of any specific future residential development projects would be assessed at the time when the projects are actually proposed, and mitigation measures would be adopted as necessary, in conformance with CEQA.

As described in the Final EIR Section 4.7, Greenhouse Gas Emissions, Issues 4.7-1 and 4.7-2 would result in less than significant impacts from the implementation of the GP 2012 Update, DSP Update, and the E-CAP. Implementation of the GP 2012 Update, DSP Update, and the ECAP would be in compliance with Assembly Bill ("AB") 32, which sets reduction targets of statewide greenhouse gas ("GHG") emissions to 1990 levels by 2020 or, as outlined in the AB 32 Scoping

Plan, the functional equivalent of 15 percent below current (2005) levels. The GP 2012 Update and E-CAP incorporates GHG-reducing policies and measures that would reduce the City's emissions by 21% from the 2020 emissions inventory. (The E-CAP was recently amended on March 10, 2021, and the new GHG reductions target is 52% by 2035.) Additionally, future development consistent with the policies of the GP Update 2012 and the reduction measures of the E-CAP, particularly those measures designed to conserve water and reduce energy, would work to reduce the effects of global climate change. Therefore, impacts would be less than significant under Issues 4.7-1 and 4.7-2.

2.8 Hazards and Hazardous Materials:

The Final EIR previously identified the following impacts associated with hazards and hazardous materials and determined the corresponding level of significance.

Issue 4.8-1 Transport, Use and Disposal of Hazardous Materials (Less than Significant)

Issue 4.8-2 Accidental Release of Hazardous Materials (Less than Significant)

Issue 4.8-3 Hazards to Schools (Less than Significant)

Issue 4.8-4 Existing Hazardous Materials Sites (Less than Significant)

Issue 4.8-5 Public Airports (Less than Significant)

Issue 4.8-6 Private Airports (Less than Significant)

Issue 4.8-7 Emergency Response and Evacuation Plans (Less than Significant)

Issue 4.8-8 Wildland Fires (Less than Significant)

These less than significant impacts were addressed in Section 4.8, Hazards and Hazardous Materials, of the Final EIR on pages 4.8-1 through 4.8-54 under the headings noted above.

The Project seeks to amend the Housing Element portion of the General Plan to meet the statutory requirements of Housing Element Law, as it was described previously in the Final EIR. The 2021-2029 Housing Element Update is a policy document and its adoption would not, in itself, produce environmental impacts. It consists of a housing program that was updated to reflect current conditions and legal requirements; no actual development is proposed as part of the Housing Element Update. However, implementation of the programs contained in the document would accommodate development required to meet the City's regional housing needs assessment, which specifies a need for land appropriately zoned to facilitate the production of new housing. Although the City does not build the housing, the Housing Element does create a plan and regulatory framework, which provides opportunities for the private sector to do so, where market conditions determine when and where housing is built.

The City's update to the Community Health and Services Chapter to integrate certain environmental justice policies, goals, and objectives, will identify issues and needs anticipated to be of ongoing concern to people in the City. Environmental justice goals, policies, and objectives will be developed by identifying disadvantaged communities and demographics to better understand the unique and disproportionate challenges faced by these communities. This will guide the City's efforts to address issues related to public health, social equity, and environmental justice.

New land use development projects would implement the proposed Housing Element Update goals and policy text changes. Those future projects would be subject to future environmental review, as required under CEQA, once sufficient information is available to complete such review. All future projects would be required to adhere to relevant development standards and design guidelines contained in the City's zoning ordinance. The potential impacts of any specific future residential development projects would be assessed at the time when the projects are actually proposed, and mitigation measures would be adopted as necessary, in conformance with CEQA.

As described in the Final EIR Section 4.8, Hazards and Hazardous Materials, issues 4.8-1, 4.8-2, 4.8-3, 4.8-4, 4.8-5, 4.8-6, 4.8-7, and 4.8-8 would result in less than significant impacts with the implementation of the GP 2012 Update, DSP Update, and the E-CAP. Future businesses, operations, or facilities developed under the GP 2012 Update, DSP Update, and the E-CAP, would involve an increase in the transport, use, and disposal of hazardous waste as well as potential accidental releases of hazardous waste. Additionally, there is potential for hazardous emissions and hazardous materials handling by future development within one-quarter mile of an existing or proposed school as well as human habitation or occupation on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. However, all future development allowable under the proposed land use designations identified in the GP 2012 Update would be required to comply with applicable federal, state, and local regulations related to hazardous materials and wastes. Therefore, impacts would be less than significant under Issues 4.8-1, 4.8-2, 4.8-3, and 4.8-4.

Future development with the implementation of the GP 2012 Update, DSP Update, and the ECAP would be predominantly low-density residential land uses or public land/open space within two miles of public or private airports. These land uses have low concentrations of persons, which would reduce the risk of safety hazards for people residing or working in the area. Therefore, significant impacts would not occur under Issues 4.8-5 and 4.8-6.

The GP 2012 Update, DSP Update, and E-CAP does not include measures that would impair emergency response or evacuation plans. However, it is possible that land uses and development implemented under these plans would require the updating of these emergency response plans. Compliance with existing regulations and continual updating of emergency response and evacuation plans would prevent implementation of the GP 2012 Update and DSP Update from impairing emergency response and evacuation plans. Impacts would be less than significant under Issue 4.8-7.

Implementation of the GP 2012 Update and DSP Update would result in land uses that allow residential, commercial, and industrial development in areas that are prone to wildfires due to a majority of the area being susceptible to wildland fires. However, compliance with existing regulations, including the Community Wildfire Protection Plan by the Escondido Fire Department, and implementation of the proposed General Plan Update policies within the Community Protection Element would reduce impacts to a level below significant under Issue 4.8-8.

2.9 Hydrology and Water Quality:

The Final EIR previously identified the following impacts associated with hydrology and water quality and determined the corresponding level of significance.

Issue 4.9-1 Water Quality Standards and Requirements (Less than Significant)

Issue 4.9-2 Groundwater Supplies and Recharge (Less than Significant)

Issue 4.9-3 Erosion or Siltation (Less than Significant)

Issue 4.9-4 Flooding (Less than Significant)

Issue 4.9-5 Exceed Capacity of Stormwater Systems (Less than Significant)

Issue 4.9-6 Housing within a 100-Year Flood Hazard Area (Less than Significant)

Issue 4.9-7 Impeding or Redirecting Flood Flows (Less than Significant)

Issue 4.9-8 Dam Inundation and Flood Hazards (Less than Significant)

Issue 4.9.9 Seiche, Tsunami and Mudflow Hazards (Less than Significant)

These less than significant impacts were addressed in Section 4.9, Hydrology and Water Quality, of the Final EIR on pages 4.9-1 through 4.9-48 under the headings noted above.

The Project seeks to amend the Housing Element portion of the General Plan to meet the statutory requirements of Housing Element Law, as it was described previously in the Final EIR. The 2021-2029 Housing Element Update is a policy document and its adoption would not, in itself, produce environmental impacts. It consists of a housing program that was updated to reflect current conditions and legal requirements; no actual development is proposed as part of the Housing Element Update. However, implementation of the programs contained in the document would accommodate development required to meet the City's regional housing needs assessment, which specifies a need for land appropriately zoned to facilitate the production of new housing. Although the City does not build the housing, the Housing Element does create a plan and regulatory framework, which provides opportunities for the private sector to do so, where market conditions determine when and where housing is built.

The City's update to the Community Health and Services Chapter to integrate certain environmental justice policies, goals, and objectives, will identify issues and needs anticipated to be of ongoing concern to people in the City. Environmental justice goals, policies, and objectives will be developed by identifying disadvantaged communities and demographics to better understand the unique and disproportionate challenges faced by these communities. This will guide the City's efforts to address issues related to public health, social equity, and environmental justice.

New land use development projects would implement the proposed Housing Element Update goals and policy text changes. Those future projects would be subject to future environmental review, as required under CEQA, once sufficient information is available to complete such review. All future projects would be required to adhere to relevant development standards and design guidelines contained in the City's zoning ordinance. The potential impacts of any specific future residential development projects would be assessed at the time when the projects are actually proposed, and mitigation measures would be adopted as necessary, in conformance with CEQA.

As described in the Final EIR Section 4.9, Hydrology and Water Quality, Issues 4.9-1, 4.9-2, 4.9-3, 4.9-4, 4.9-5, 4.9-6, 4.9-7, 4.9-8, and 4.9-9 would result in less than significant impacts with the implementation of the GP 2012 Update, DSP Update, and the E-CAP. Construction and operation of future development under the GP 2012 Update and DSP Update would mandatorily comply with all applicable existing regulations including but not limited to the Clean Water Act, NPDES permit program, Porter-Cologne Water Quality Control Act, San Diego Basin Plan, City of Escondido water quality management plans, as well as policies proposed under the GP 2012 Update in the Resource Conservation Element, Community Protection Element, Mobility and Infrastructure Element, and Land Use Element. The plans would not utilize groundwater for any purpose and would, therefore, not deplete groundwater supplies. Further, the GP 2012 Update, DSP Updates, and measures identified in the E-CAP would not result in the placement of development in areas that would expose people to hazards associated with inundation by a tsunami, seiches, or mudflows. Therefore, impacts would be less than significant under Issues 4.9-1, 4.9-2, 4.9-3, 4.9-4, 4.9-5, 4.9-6, 4.9-7, 4.9-8, and 4.9-9.

2.10 Land Use:

The Final EIR previously identified the following impacts associated with land use and determined the corresponding level of significance.

Issue 5.10-1 Physical Division of an Established Community (Less than Significant)

Issue 5.10-2 Conflicts with Land Use Plans, Policies, and Regulations (Less than Significant)

Issue 5.10-3 Conflicts with HCPs or NCCPs (Less than Significant)

These less than significant impacts were addressed in Section 4.10, Land Use, of the Final EIR on pages 4.10-1 through 4.10-38 under the headings noted above.

The Project seeks to amend the Housing Element portion of the General Plan to meet the statutory requirements of Housing Element Law, as it was described previously in the Final EIR. The 2021-2029 Housing Element Update is a policy document and its adoption would not, in itself, produce environmental impacts. It consists of a housing program that was updated to reflect current conditions and legal requirements; no actual development is proposed as part of the Housing Element Update. However, implementation of the programs contained in the document would accommodate development required to meet the City's regional housing needs assessment, which specifies a need for land appropriately zoned to facilitate the production of new housing. Although the City does not build the housing, the Housing Element does create a plan and regulatory framework, which provides opportunities for the private sector to do so, where market conditions determine when and where housing is built.

The City's update to the Community Health and Services Chapter to integrate certain environmental justice policies, goals, and objectives, will identify issues and needs anticipated to be of ongoing concern to people in the City. Environmental justice goals, policies, and objectives will be developed by identifying disadvantaged communities and demographics to better understand the unique and disproportionate challenges faced by these communities. This will guide the City's efforts to address issues related to public health, social equity, and environmental justice.

New land use development projects would implement the proposed Housing Element Update goals and policy text changes. Those future projects would be subject to future environmental review, as required under CEQA, once sufficient information is available to complete such review. All future projects would be required to adhere to relevant development standards and design guidelines contained in the City's zoning ordinance. The potential impacts of any specific future residential development projects would be assessed at the time when the projects are actually proposed, and mitigation measures would be adopted as necessary, in conformance with CEQA.

As described in the Final EIR Section 4.10, Land Use, Issues 4.10-1, 4.10-2, and 4.10-3 would result in less than significant impacts with the implementation of the GP 2012 Update, DSP Update, and the E-CAP. The GP 2012 Update and DSP Update do not propose any new roadways or other specific features that would physically divide an established community. Growth under the GP 2012 Update would be concentrated in 15 designated study areas and would not substantially change physical development patterns in established communities. Development standards in the GP 2012 Update would ensure that new development would not preclude future development as long as it is consistent with the proposed land use plan. The DSP Update would retain the development standards that ensure compatibility with the character and vision for the downtown area. The GP 2012 Update, DSP Update, and the E-CAP would not conflict with ant HCPs or NCCPs and would comply with regulations set forth in the Resource Conservation Element in the GP 2012 Update. Therefore, impacts would be less than significant under Issues 4.10-1, 4.10-2, and 4.10-3.

2.11 Mineral Resources:

The Final EIR previously identified the following impacts associated with mineral resources and determined the corresponding level of significance.

Issue 4.11-1 Mineral Resource Availability (Less than Significant)

Issue 4.11-2 Mineral Resource Recovery Sites (Less than Significant)

These less than significant impacts were addressed in Section 4.11, Mineral Resources, of the Final EIR on pages 4.11-1 through 4.11-14 under the headings noted above.

The Project seeks to amend the Housing Element portion of the General Plan to meet the statutory requirements of Housing Element Law, as it was described previously in the Final EIR. The 2021-2029 Housing Element Update is a policy document and its adoption would not, in itself, produce environmental impacts. It consists of a housing program that was updated to reflect current conditions and legal requirements; no actual development is proposed as part of the Housing Element Update. However, implementation of the programs contained in the document would accommodate development required to meet the City's regional housing needs assessment, which specifies a need for land appropriately zoned to facilitate the production of new housing. Although the City does not build the housing, the Housing Element does create a plan and regulatory framework, which provides opportunities for the private sector to do so, where market conditions determine when and where housing is built.

The City's update to the Community Health and Services Chapter to integrate certain environmental justice policies, goals, and objectives, will identify issues and needs anticipated to be of ongoing concern to people in the City. Environmental justice goals, policies, and objectives will be developed by identifying disadvantaged communities and demographics to better understand the unique and disproportionate challenges faced by these communities. This will guide the City's efforts to address issues related to public health, social equity, and environmental justice.

New land use development projects would implement the proposed Housing Element Update goals and policy text changes. Those future projects would be subject to future environmental review, as required under CEQA, once sufficient information is available to complete such review. All future projects would be required to adhere to relevant development standards and design guidelines contained in the City's zoning ordinance. The potential impacts of any specific future residential development projects would be assessed at the time when the projects are actually proposed, and mitigation measures would be adopted as necessary, in conformance with CEQA.

As described in the Final EIR Section 4.11, Mineral Resources, Issues 4.11-1 and 4.11-2 would result in less than significant impacts from the implementation of the GP 2012 Update, DSP Update, and the E-CAP. The existing GP 2012 Update, DSP Update, and E-CAP does not include any goals or policies specifically related to mineral resources or mineral resource extraction. However, if new mineral extraction facilities were to be approved, it would be required to comply with the goals and policies that apply to all development. The existing GP 2012 Update planning area is developed with land uses that limit the availability of mineral resources. Additionally, only

a small portion of the planning area has been designated as containing known mineral resources of value. New development proposed near existing extraction facilities would be required to demonstrate compatibility with existing land uses as part of project approval. Therefore, impacts would be less than significant under Issue 4.11-1 and 4.11-2.

2.12 Noise:

The Final EIR previously identified the following impacts associated with noise and determined the corresponding level of significance.

Issue 4.12-1 Excessive Noise Levels (Less than Significant)

Issue 4.12-2 Excessive Groundborne Vibration (Significant and Unavoidable)

Issue 4.12-3 Permanent Increase in Ambient Noise Levels - Cumulative (Significant and Unavoidable)

Issue 4.12-4 Temporary Increase in Ambient Noise Levels (Less than Significant)

Issue 4.12-5 Excessive Noise Exposure from Airports (Less than Significant)

These issues were addressed in Section 4.12, Noise, of the Final EIR on pages 4.12-1 through 4.12-54 under the headings noted above.

The Project seeks to amend the Housing Element portion of the General Plan to meet the statutory requirements of Housing Element Law, as it was described previously in the Final EIR. The 2021-2029 Housing Element Update is a policy document and its adoption would not, in itself, produce environmental impacts. It consists of a housing program that was updated to reflect current conditions and legal requirements; no actual development is proposed as part of the Housing Element Update. However, implementation of the programs contained in the document would accommodate development required to meet the City's regional housing needs assessment, which specifies a need for land appropriately zoned to facilitate the production of new housing. Although the City does not build the housing, the Housing Element does create a plan and regulatory framework, which provides opportunities for the private sector to do so, where market conditions determine when and where housing is built.

The City's update to the Community Health and Services Chapter to integrate certain environmental justice policies, goals, and objectives, will identify issues and needs anticipated to be of ongoing concern to people in the City. Environmental justice goals, policies, and objectives will be developed by identifying disadvantaged communities and demographics to better understand the unique and disproportionate challenges faced by these communities. This will guide the City's efforts to address issues related to public health, social equity, and environmental justice.

New land use development projects would implement the proposed Housing Element Update goals and policy text changes. Those future projects would be subject to future environmental review, as required under CEQA, once sufficient information is available to complete such review. All future projects would be required to adhere to relevant development standards and design guidelines contained in the City's zoning ordinance. The potential impacts of any specific future residential development projects would be assessed at the time when the projects are actually proposed, and mitigation measures would be adopted as necessary, in conformance with CEQA.

As described in the Final EIR Section 4.12, Noise, future development under the GP 2012 Update, DSP Update, and E-CAP would have the potential to expose noise-sensitive land uses (NSLU) and new commercial, office, and industrial land uses to excessive noise levels from existing roadway noise and noise related to existing commercial, industrial, and extractive land uses, and the Palomar Energy Center power plant. However, compliance with existing regulations such as the Noise Ordinance, and implementation of the GP 2012 Update's goals and policies, including Noise Policies 5.1 through 5.4 and the Noise Compatibility Guidelines, would reduce impacts under Issue 4.12-1 to less than significant.

Construction of new land uses under the GP 2012 Update, DSP Update, and E-CAP and placement of new development in close proximity to the SPRINTER rail line would have the potential to result in impacts associated with excessive groundborne vibration. This includes significant impacts related to groundborne noise during construction and potential damage to buildings that may be susceptible to vibration damage from construction equipment. The potential also exists for cumulative construction projects to result in combined construction impacts if occurring simultaneously or construction activities in close proximity to the

SPRINTER line. The GP 2012 Update Noise Policy 5.5 requires compliance with the Federal Transit Administration (FTA) vibration criteria for construction that would occur under these plans. However, additional mitigation is necessary to ensure proper setbacks are established. Mitigation measures Noi-1 and Noi-2 would be implemented to reduce direct and cumulative impacts associated with groundborne vibrations, but not to a less than significant level. Impacts would remain significant and unavoidable under Issue 4.12-2.

Future development and redevelopment consistent with the GP 2012 Update, DSP Update, and E-CAP would have the potential to substantially increase ambient noise levels above existing conditions as a result of increases in roadway noise and new operational noise sources. However, implementation of the GP 2012 Update Noise Policy, including Noise Policy 5.6 which requires technical reports be prepared for future development that would have the potential to substantially increase ambient noise levels, the Incremental Noise Impact Standards by the FTA, and the City's Noise Ordinance would reduce direct impacts related to permanent increases in ambient noise to less than significant under Issue 4.12-3. However, land use development in accordance with these plans would still contribute to cumulative future regional noise increases associated with roadway traffic. Two mitigation measures were identified to fully reduce impacts to below a level of significance but the City determined that these measures were infeasible.

Future development under the GP 2012 Update, DSP Update, and E-CAP would have the potential to result in temporary increases in ambient noise levels due to construction of new land uses and infrastructure. However, existing City policies, the GP 2012 Update goals and Policies, and the City's Noise Ordinance would reduce impacts to less than significant under Issue 4.12-4. Future development under the GP 2012 Update, DSP Update, and E-CAP would not expose people residing or working in the GP 2012 Update area to excessive noise levels from a nearby public airport or private airstrip. Impacts would be less than significant under Issue 4.12-5.

5.13 Population and Housing

The Final EIR previously identified the following impacts associated with population and housing and determined the corresponding level of significance.

Issue 4.13-1 Population Growth (Less than Significant)

Issue 4.13-2 Displacement of Housing and People (Significant and Unavoidable)

These issues were addressed in Section 4.13, Population and Housing, of the Final EIR on pages 4.13-1 through 4.13-24 under the headings noted above.

The Project seeks to amend the Housing Element portion of the General Plan to meet the statutory requirements of Housing Element Law, as it was described previously in the Final EIR. The 2021-2029 Housing Element Update is a policy document and its adoption would not, in itself, produce environmental impacts. It consists of a housing program that was updated to reflect current conditions and legal requirements; no actual development is proposed as part of the Housing Element Update. However, implementation of the programs contained in the document would accommodate development required to meet the City's regional housing needs assessment, which specifies a need for land appropriately zoned to facilitate the production of new housing. Although the City does not build the housing, the Housing Element does create a plan and regulatory framework, which provides opportunities for the private sector to do so, where market conditions determine when and where housing is built.

The City's update to the Community Health and Services Chapter to integrate certain environmental justice policies, goals, and objectives, will identify issues and needs anticipated to be of ongoing concern to people in the City. Environmental justice goals, policies, and objectives will be developed by identifying disadvantaged communities and demographics to better understand the unique and disproportionate challenges faced by these communities. This will guide the City's efforts to address issues related to public health, social equity, and environmental justice.

New land use development projects would implement the proposed Housing Element Update goals and policy text changes. Those future projects would be subject to future environmental review, as required under CEQA, once sufficient information is available to complete such review. All future projects would be required to adhere to relevant development standards and design guidelines contained in the City's zoning ordinance. The potential impacts of any specific future

residential development projects would be assessed at the time when the projects are actually proposed, and mitigation measures would be adopted as necessary, in conformance with CEQA.

As described in the Final EIR Section 4.13, Population and Housing, implementation of the GP 2012 Update, DSP Update, and E-CAP would directly and indirectly induce population growth that is consistent with forecasted growth for these plan areas. The GP 2012 Update is a comprehensive plan to guide future growth and includes a framework for land use development, as well as goals and policies to prevent unanticipated or inappropriate population growth in the GP and DSP area. Compliance with the GP 2012 Update policies and regulations would reduce impacts to less than significant under Issue 4.13-1.

Future development under the GP 2012 Update, DSP Update, and the E-CAP would result in the displacement of substantial number of existing housing and people, necessitating the construction of replacement housing elsewhere. The GP 2012 Update land uses would displace up to 142 existing residential dwelling units and the GP 2012 Update's proposed Mobility and Infrastructure Element would have the potential to displace up to 300 businesses and residences. Mitigation measure Pop-1 would be implemented to mitigate impacts related to the displacement of homes. Despite compliance with existing regulations, implementation of the proposed GP 2012 Update policies, and mitigation measures Pop-1, the project's direct impact would remain significant and unavoidable.

2.14 Public Services:

The Final EIR previously identified the following impacts associated with public services and determined the corresponding level of significance.

Issue 4.14-1 Fire Protection Services (Less than Significant)

Issue 4.14-2 Police Protection Services (Less than Significant)

Issue 4.14-3 School Services (Less than Significant)

Issue 4.14-4 Library Services (Less than Significant)

The Project seeks to amend the Housing Element portion of the General Plan to meet the statutory requirements of Housing Element Law, as it was described previously in the Final EIR. The 2021-2029 Housing Element Update is a policy document and its adoption would not, in itself, produce environmental impacts. It consists of a housing program that was updated to reflect current conditions and legal requirements; no actual development is proposed as part of the Housing Element Update. However, implementation of the programs contained in the document would accommodate development required to meet the City's regional housing needs assessment, which specifies a need for land appropriately zoned to facilitate the production of new housing. Although the City does not build the housing, the Housing Element does create a plan and

regulatory framework, which provides opportunities for the private sector to do so, where market conditions determine when and where housing is built.

The City's update to the Community Health and Services Chapter to integrate certain environmental justice policies, goals, and objectives, will identify issues and needs anticipated to be of ongoing concern to people in the City. Environmental justice goals, policies, and objectives will be developed by identifying disadvantaged communities and demographics to better understand the unique and disproportionate challenges faced by these communities. This will guide the City's efforts to address issues related to public health, social equity, and environmental justice.

New land use development projects would implement the proposed Housing Element Update goals and policy text changes. Those future projects would be subject to future environmental review, as required under CEQA, once sufficient information is available to complete such review. All future projects would be required to adhere to relevant development standards and design guidelines contained in the City's zoning ordinance. The potential impacts of any specific future residential development projects would be assessed at the time when the projects are actually proposed, and mitigation measures would be adopted as necessary, in conformance with CEQA.

As described in the Final EIR Section 4.14, Public Services, Issues 4.14-1, 4.14-2, 4.14-2, 4.14-3 and 4.14-4 would result in less than significant impacts resulting from the implementation of the GP 2012 Update, DSP Update, and E-CAP. Implementation of the GP 2012 Update, DSP Update, and E-CAP would not increase the demand for fire protection, police protection, school services, and library services. Development consistent with the GP 2012 Update and DSP Update includes policies that help to minimize deterioration of fire and police agency response times and school and library services and environmental impacts related to the construction or expansion of additional facilities. Therefore, impacts would be less than significant under Issues 4.14-1, 4.14-2, 4.14-3 and 4.14-4.

2.15 Recreation

The Final EIR previously identified the following impacts associated with recreation and determined the corresponding level of significance.

Issue 4.15-1 Deterioration of Parks and Recreational Facilities (Less than Significant)

Issue 4.15-2 Construction of New Recreational Facilities (Less than Significant)

These less than significant impacts were addressed in Section 4.15, Recreation, of the Final EIR on pages 4.15-1 through 4.15-24 under the headings noted above.

The Project seeks to amend the Housing Element portion of the General Plan to meet the statutory requirements of Housing Element Law, as it was described previously in the Final EIR. The 2021-2029 Housing Element Update is a policy document and its adoption would not, in itself, produce environmental impacts. It consists of a housing program that was updated to reflect current

conditions and legal requirements; no actual development is proposed as part of the Housing Element Update. However, implementation of the programs contained in the document would accommodate development required to meet the City's regional housing needs assessment, which specifies a need for land appropriately zoned to facilitate the production of new housing. Although the City does not build the housing, the Housing Element does create a plan and regulatory framework, which provides opportunities for the private sector to do so, where market conditions determine when and where housing is built.

The City's update to the Community Health and Services Chapter to integrate certain environmental justice policies, goals, and objectives, will identify issues and needs anticipated to be of ongoing concern to people in the City. Environmental justice goals, policies, and objectives will be developed by identifying disadvantaged communities and demographics to better understand the unique and disproportionate challenges faced by these communities. This will guide the City's efforts to address issues related to public health, social equity, and environmental justice.

New land use development projects would implement the proposed Housing Element Update goals and policy text changes. Those future projects would be subject to future environmental review, as required under CEQA, once sufficient information is available to complete such review. All future projects would be required to adhere to relevant development standards and design guidelines contained in the City's zoning ordinance. The potential impacts of any specific future residential development projects would be assessed at the time when the projects are actually proposed, and mitigation measures would be adopted as necessary, in conformance with CEQA.

As described in the Final EIR Section 4.15, Recreation, Issues 4.14-1 and 4.14-2 would result in less than significant impacts resulting from implementing the GP 2012 Update, DSP Update, and E-CAP. As analyzed in the Final EIR, neighborhood and community parks are currently deficient in the City and implementation of the GP 2012 Update, DSP Update, and E-CAP would increase use of existing parks, thereby resulting in accelerated deterioration of recreational facilities. Additionally, the construction or expansion of recreational facilities to address the increased growth, may have an adverse effect on the environment. However, implementation of the proposed General Plan Update policies and Planning Principal and Guideline 1k(1) within the Downtown Specific Plan Update and E-Cap measures would reduce impacts to below a level of significance under Issues 4.14-1 and 4.14-2.

2.16 Transportation and Traffic:

The Final EIR previously identified the following impacts associated with transportation and traffic and determined the corresponding level of significance.

Issue 4.16-1 Traffic and LOS Standards (Significant and Unavoidable)

Issue 4.16-2 Air Traffic (Less than Significant)

Issue 4.16-3 Rural Road Safety (Less than Significant)

Issue 4.16-4 Emergency Access (Less than Significant)

Issue 4.16-5 Alternative Transportation (Less than Significant)

These issues were addressed in Section 4.16, Transportation and Traffic, of the Final EIR on pages 4.16-1 through 4.16-88 under the headings noted above.

As described in the Final EIR Section 4.16, Issues 4.16-2, 4.16-3, 4.16-4 and 4.16-5 would result in less than significant impacts and Issue 4.16-1 would result in significant and unavoidable impacts resulting from the implementation of the GP 2012 Update, DSP Update, and E-CAP. Implementation of the GP 2012 Update, DSP Update, and E-CAP would not result in changes to air traffic patterns, result in increased traffic on roadways with horizontal or vertical curves that are sharper than existing standards, or impair emergency access. In addition, implementation of policies in the DSP Update and E-CAP measures would create provisions for alternative modes of transportation, including multi-modal transit stations, bike lanes, bus stops, trails, and sidewalks. Therefore, impacts would be less than significant under Issues 4.16-2, 4.16-3, 4.16-4 and 4.16-5.

Implementation of the GP 2012 Update, DSP Update, and E-CAP would result in 14 deficient roadway segments and seven deficient intersections throughout the proposed project area resulting in a significant direct and cumulative impact. Implementation of the proposed GP 2012 Update and DSP Update policies and mitigation measures, in addition to compliance with applicable regulations, would reduce nine traffic impacts to a level below significant. However, 11 roadway segment and intersection impacts would remain above a level of significance because mitigation for these impacts has been determined to be infeasible by the City. Therefore, the proposed project would result in significant and unavoidable traffic and level of service (LOS) impacts under Issue 4.16-1.

5.17 Utilities and Service Systems:

The Final EIR previously identified the following impacts associated with utilities and service systems and determined the corresponding level of significance.

Issue 4.17-1 Wastewater Treatment Requirements (Less than Significant)

Issue 4.17-2 New Water or Wastewater Treatment Facilities (Less than Significant)

Issue 4.17-3 Sufficient Stormwater Drainage Facilities (Less than Significant)

Issue 4.17-4 Adequate Water Supplies (Significant and Unavoidable)

Issue 4.17-5 Adequate Wastewater Facilities (Less than Significant)

Issue 4.17-6 Sufficient Landfill Capacity (Significant and Unavoidable)

Issue 4.17-7 Solid Waste Regulations (Less than Significant)

Issue 4.17-8 Energy (Less than Significant)

These issues were addressed in Section 4.17, Utilities and Service Systems, of the Final EIR on pages 4.17-1 through 4.17-58 under the headings noted above.

The Project seeks to amend the Housing Element portion of the General Plan to meet the statutory requirements of Housing Element Law, as it was described previously in the Final EIR. The 2021-2029 Housing Element Update is a policy document and its adoption would not, in itself, produce environmental impacts. It consists of a housing program that was updated to reflect current conditions and legal requirements; no actual development is proposed as part of the Housing Element Update. However, implementation of the programs contained in the document would accommodate development required to meet the City's regional housing needs assessment, which specifies a need for land appropriately zoned to facilitate the production of new housing. Although the City does not build the housing, the Housing Element does create a plan and regulatory framework, which provides opportunities for the private sector to do so, where market conditions determine when and where housing is built.

The City's update to the Community Health and Services Chapter to integrate certain environmental justice policies, goals, and objectives, will identify issues and needs anticipated to be of ongoing concern to people in the City. Environmental justice goals, policies, and objectives will be developed by identifying disadvantaged communities and demographics to better understand the unique and disproportionate challenges faced by these communities. This will guide the City's efforts to address issues related to public health, social equity, and environmental justice.

New land use development projects would implement the proposed Housing Element Update goals and policy text changes. Those future projects would be subject to future environmental review, as required under CEQA, once sufficient information is available to complete such review. All future projects would be required to adhere to relevant development standards and design guidelines contained in the City's zoning ordinance. The potential impacts of any specific future residential development projects would be assessed at the time when the projects are actually proposed, and mitigation measures would be adopted as necessary, in conformance with CEQA.

As described in the Final EIR Section 4.17, Utilities and Service Systems, Issues 4.17-1, 4.17-2, 4.17-3, 4.17-5, 4.17-7, and 4.17-8 would result in less than significant impacts resulting from the implementation of the GP 2012 Update, DSP Update, and E-CAP. Issues 4.17-4 and 4.17-6 would result in significant and unavoidable impacts resulting from the implementation of the GP 2012 Update, DSP Update, and E-CAP. Implementation of the GP 2012 Update, DSP Update and E-CAP could result in the demand for wastewater treatment services to increase at a rate disproportionate to facility capabilities, which would result in a violation in wastewater treatment standards. However, compliance with existing regulations and implementation of the GP 2012

Update and E-CAP reduction measures would reduce this impact to below a level of significance. Similarly, the implementation of the GP 2012 Update, DSP Update, and E-CAP could have the potential to increase the demand requiring the construction of new or expanded water, wastewater, and stormwater facilities and increase the demand for wastewater treatment services. However, existing regulations and policies in the GP 2012 Update and E-CAP reduction measures would reduce impacts to these facilities and services to levels below significance. Similarly, implementation of the GP 2012 Update, DSP Update, and E-CAP would increase demand for energy, resulting in the need for new or expanded energy facilities to be constructed, which would have the potential to result in significant environmental effects. However, the construction of new energy facilities would be subject to CEQA and/or NEPA and impacts would be mitigated, to the extent feasible. Additionally, multiple GP 2012 Update and E-CAP policies exist that would reduce energy consumption and the need to build new energy facilities. Therefore, impacts associated with energy would be less than significant under Issues 4.17-1, 4.17-2, 4.17-3, 4.17-5, 4.17-7, and 4.17-8.

Implementation of the GP 2012 Update, DSP Update, and E-CAP would result in significant and unavoidable impacts associated with adequate water supplies. Adequate water supply may not be available to serve the proposed project due to projections of water shortages during multiple dry water years by San Diego County Water Authority ("SDCWA"), Vallecitos Water District ("VWD") and Rincon Del Diablo Water District ("RDD"). Cumulative projects would also result in a significant cumulative impact and the proposed project would contribute to a significant cumulative impact associated with adequate water supplies. Even with compliance with existing regulations, policies contained in the GP 2012 Update policies, E-CAP reduction measures, and mitigation measure Util-1, impacts would remain significant and unavoidable under Issue 4.17-4. Similarly, the 2012 GP Update, DSP Update, and E-CAP has the potential to be served by a landfill with insufficient capacity to accommodate the solid waste disposal needs of the project. Compliance with existing regulations and GP 2012 Update policies and E-CAP reduction measures would reduce impacts associated with sufficient landfill capacity, although not to below a level of significance. Mitigation measures have been identified to reduce impacts to a less than significant level; however, the City finds these measures to be infeasible because they do not meet the project objectives, would prohibit growth, and place undue burden on developers to create additional landfill capacity. Until additional solid waste disposal facilities are permitted and constructed within the San Diego region, the proposed project's impact would remain significant and unavoidable. Therefore, the 2012 GP Update, DSP Update, and E-CAP would result in significant direct and cumulative impacts under Issue 4.17-6.

3.0 Findings

3.1 Rationale for Addendum:

The Addendum to the Final EIR finds that the impacts resulting from implementation of the 2012 GP Update, DSP Update, and E-CAP remain the same, aside from the Project's proposed modification, and the mitigation measures would remain unchanged and are still valid and enforceable. No considerably different mitigation measures or feasible alternatives have been

identified. The Addendum to finds that the previously identified impacts and mitigation measures, as described in the Final EIR, are still applicable to the General Plan. Therefore, the Final EIR, as certified, remains adequate and complete. The Project can be approved as an activity covered within the scope of the Final EIR. No circumstances exist calling for the preparation of a subsequent or supplemental EIR pursuant to CEQA Guidelines sections 15162 and 15163.

3.2 Substantial Changes in Circumstances, New Information Showing Greater Significant Effects, or the Ability to Reduce Significant Effects in Previous EIR:

There are no substantial changes to the circumstances under which the proposed Project is undertaken that would require major revisions to the Final EIR. There is no new information of substantial importance that was not known or could not have been known at the time the Final EIR was certified that shows the proposed Project would have significant effects not discussed previously; a substantial increase in severity of a previously identified significant impact; mitigation measures or alternatives previously found infeasible that would now be feasible and would substantially reduce one or more significant effects; or mitigation measures or alternatives that are considerably different from those analyzed in the Final EIR that would substantially reduce one or more significant effects on the environment. Environmental effects associated with the Project were evaluated in the Final EIR. The Project would not result in new or more severe impacts beyond those addressed in the Final EIR, and would not meet any other standards for requiring further environmental review under CEQA Guidelines sections 15162 and 15163. No further analysis is required.