

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. Consistent with General Plan Review and Amendment Policy 17.5, required updates to the Housing Element pursuant to Government Code section 65302 provide substantial documentation that such amendment is appropriate for the general public welfare.
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. The revised 2021-2029 Housing Element continues to analyze 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 inventory of resources available to accommodate the identified housing needs are deemed suitable. The inventory of sites identified for potential residential development include reliance on non-vacant and underutilized sites for 50% or more of the City's RHNA for lower income households. The revised 2021-2029 Housing Element describes findings that such uses will likely be discontinued, based on substantial evidence. Specifically, the revised 2021-2029 Housing Element provides an explanation and methodology for determining realistic buildout potential of these sites within the planning period based on the following factors: land-to-improvement ratio, building age, and net new unit ratio.
9. The revised 2021-2029 Housing Element 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's 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 revised 2021-2029 Housing Element continues to identify 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.
10. In addition to the particular Government Code sections cited above and within both the February 28, 2023 and July 27, 2021, Planning Commission Staff Reports, 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.
11. 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 correspondence (May 25, 2021) and revisions to the adopted Housing Element were made in response to HCD's most recent correspondence (August 10, 2021, June 2, 2022, and August 2, 2022) 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. As of HCD's most recent correspondence (December 8, 2022) the proposed revisions to the 2021-2029 Housing Element comply with statutory requirements.
12. Once adopted, the revised 2021-2029 Housing Element 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 revised 2021-2029 Housing Element, the controlling force of law.

13. General Plan Consistency: The City is able to meet its RHNA requirement without any changes to General Plan designations or densities allowed. New and revised policies are included in the revised 2021-2029 Housing Element, 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.