



August 7, 2026

Chair and Planning Commissioners
Escondido Planning Commission
Via email

RE: Agenda item #2: Direct re-design of the Alexan and Bethel Baptist Church proposal (PL-23-2073 et al) to protect to protect human health.

Dear Planning Commissioners,

Escondido Neighbors United (ENU) is a local community-based organization with a major focus in Southwest Escondido and the Felicita Creek watershed where the project is proposed.

We have two important recommendations about changes to the project which should be made.

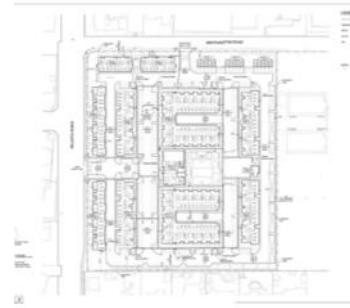
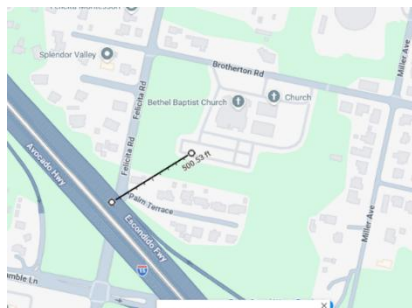
1. Remove housing from known unhealthful locations within 500-feet of the freeway.

We urge you to direct a redesign of this project to exclude housing from within a 500-foot buffer from the freeway. This is a well-known and well-documented health hazard to people and is clearly laid out in the California Air Resources Board (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*.¹

Table 1-1
Recommendations on Siting New Sensitive Land Uses
Such As Residences, Schools, Daycare Centers, Playgrounds, or Medical
Facilities*

Source Category	Advisory Recommendations
Freeways and High-Traffic Roads	- 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. - Avoid siting new sensitive land uses within 1,000 feet of a

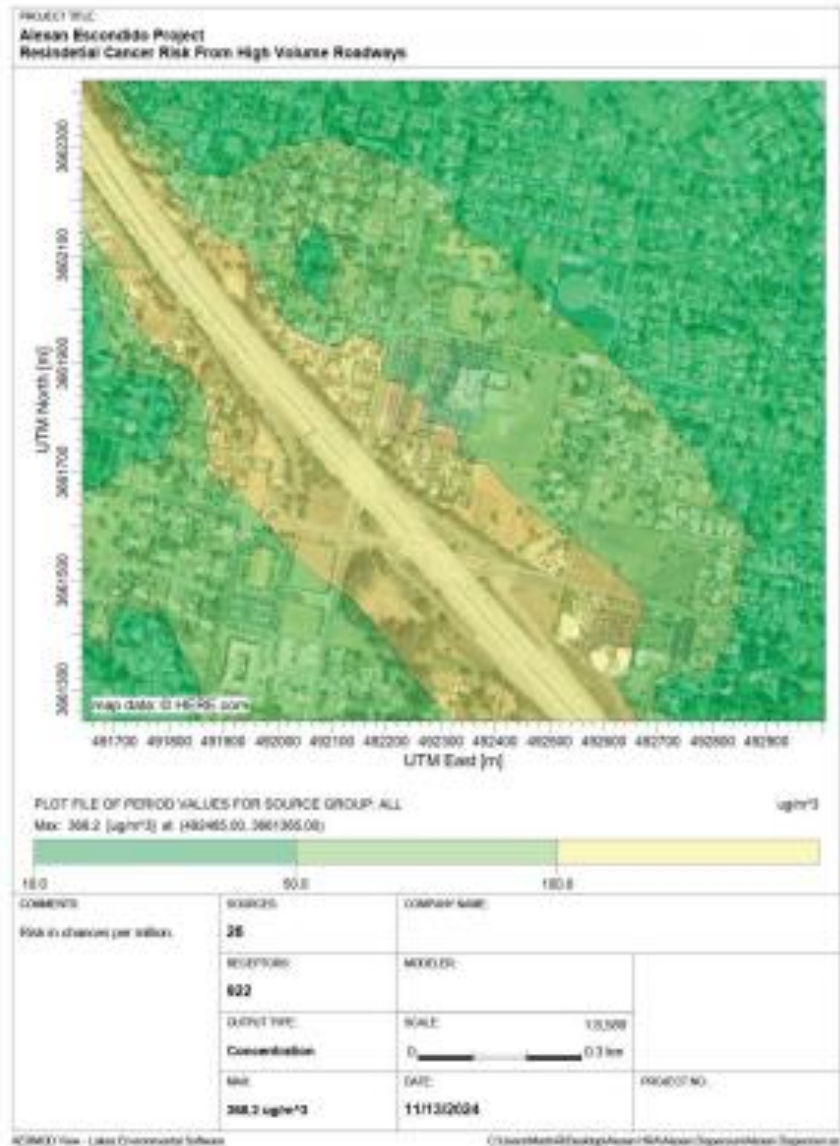
As you can see in the maps below, a re-design that would result in protecting public health through separation from the freeway does not impact a large portion of the site and could be accommodated.



¹ https://ww2.arb.ca.gov/sites/default/files/2023-05/Land%20Use%20Handbook_0.pdf

It is ironic that the Escondido General Plan does address the health impacts of the pollution from the freeway by restricting locating open air recreational spaces within this zone when people might spend an hour a day, but prohibiting location of homes in the same area.

This is a [map from the FEIR](#) (p.268) showing the increased Residential Cancer Risk areas from High Volume Roadways.² Yellow and light green show extent of elevated cancer risks.



Anticipating a justification often made for building in this unhealthy zone (that there are already homes within 500 feet of the freeway), we suggest the city's appropriate and best planning response is to **prevent expansion of this negative impact** on public health in the city.

² <https://www.escondido.gov/DocumentCenter/View/9164/Appendix-B---Air-Quality-and-GHG> page 268

Another General Plan policy that acknowledges the negative impacts of housing within 500 feet, but fails to protect the community due to a loophole can be found in policy, 1.1.2.

*“1.1.2 At a minimum, as part of the seventh cycle Housing Element update, **exclude parcels that are within 500-feet of an I-15 or SR-78 freeway lane** and remove their eligibility as suitable inventory sites. Further, assess the feasibility of excluding sites within 500-feet of super prime arterials and super major roadways and consider expanding ineligibility of parcels to 1,000-feet around the I-15 and SR-78 freeways. Future determination of inventory and suitable sites shall prioritize sites outside these distances when determining suitability.”*

Although the General Plan seems to demonstrate an understanding of the negative health impacts of this region and a plan to exclude housing sites as inventory sites, the problem is that this project is a GPA and Zoning amendment means it would not show up in the inventory.

Unfortunately, the ‘mitigation’ for the known health impact is MERV air filters which are insufficient. They might reduce impacts for a while, but this is a 50-75 year project. Filters, subject to on-going maintenance and operational failures, cannot be relied on in the long-term. They are more appropriate when a home is between 500-1,000 feet from the freeway. One thousand feet is where the risks drop significantly.

Separation is the only permanent means to reduce this risk.

Please direct the developer to relocate the housing units from the Southwest corner of this project to remove residents for 500-foot buffer area.

2. Address hardening of the watershed

This project also constitutes a significant additional hardening in the Felicita Creek watershed that is already often over-capacity. With climate change and with forecasts of worsening storms, this issue will be larger and more significant in the future than the past. The reliance on past weather data and predictions will not serve us well here and in the future.

ENU members have direct experience with the history of construction/project stormwater management failures in our small watershed that have caused a lot of downstream damage to Felicita Park and private properties, so we ask that the city ensure that overflows that overwhelm the detention basins are prevented.

Thank you for considering these important changes.

Laura Hunter for
Escondido Neighbors United

cc. Ivan Flores, City of Escondido
Paula Forbis, EO, APCD
Jason Hemmings, Director County Parks and Recreation