Public Meetings in the Streamlined Housing Era: A Practical Guide for Conducting Public Hearings on Housing in California

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Executive Summary

Historically, housing approvals throughout the State of California are subject to multiple iterations of public hearings, which has enabled a Pandora's box of tactics to delay, stall, and deny housing projects and perpetuate a housing crisis. As a response to the housing crisis, the State Legislature has turned to passing several bills aimed at streamlining the housing approval process, including exempting certain projects from environmental review, discretionary review, and public hearings. However, the implementation of new housing legislation largely falls on local government planning staff, who are often already heavily impacted by existing responsibilities. In addition, with housing at the forefront of enforcement efforts by the California Department of Housing and Community Development and the Department of Justice, any decision contrary to housing is at risk of litigation and penalties. Local government planners are at a crossroads between good planning practices and executing their duties on behalf of constituents and jurisdiction.

This analysis aims to serve as a "how-to" guide for local government planning staff for conducting public hearings on housing developments in what I term "the era of housing streamlining". Given the changes in the housing approval process in California, which limits or removes the ability for officials to deny housing projects, I suggest, based on a review of planning and zoning literature, case studies of local governments in California, and stakeholder interviews, proposals for local government planners to consider. The suggestions I put forth to local government planners were reached using a quantitative-alternatives matrix where I score and rank the different proposals.

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1. Introduction

Overview

The State of California is in a housing crisis, resulting from a combination of a lack of housing units overall and a lack of affordable housing units in particular. In a 2017 post on the social media outlet Medium, then-candidate for California Governor Gavin Newsom pledged to develop 3.5 million homes by 2025 as part of his platform. To meet this goal, the State would have needed to permit 437,500 units per year; in 2022, the year with the most permits according to Department of Housing and Community Development (HCD) records, the State permitted 135,404 units. Therefore, while housing development has not met that campaign goal, or even reduced goals in subsequent years, the sentiment continues to be the same: the State needs more housing (Tobias, 2022). Housing demand in the State continues to rise, with 42% of homes year-to-date in 2024 selling above the listing price, up 10.2% from 2023 (Redfin, 2024). The background on how the State fell into this dire situation is murky at best, though some consistent themes are contributing to the situation.

In the remainder of this first section, I will provide a historical overview of local government land use practices. Then, I will describe the Regional Housing Needs Allocation (RHNA) process through which local governments are assigned a certain number of units they need to zone for the eight-year planning period (cycle). Next, I will describe General Plan Housing Elements by giving a historical context to their general ineffectiveness in the past to stimulate meaningful housing development and recent developments to position the housing elements as important tools for housing into the future. Lastly, I will describe the role of the California Environmental Quality Act (CEQA) and how the well-intentioned law has become a vehicle for opponents of housing to delay or deny housing projects in California.

Local governments (cities and counties), in California, historically have been given autonomy over land-use planning decisions, including zoning and approval of residential developments within jurisdictional boundaries. This variation to control what does and what does not get built within a jurisdiction's boundaries has led to some local governments being exclusive, built out primarily with single-family homes, while other local governments, often neighboring or adjacent communities, bear the brunt of the multifamily housing stock.

Regional Housing Needs Allocation (RHNA)

The RHNA process involves two sequential events in the form of the "regional" allocation of housing units and the "local" allocation of housing units. First, the California Department of Housing and Community Development (HCD), using California Department of Finance (DOF) data, creates a mathematical equation to establish the number of housing units a region must plan for. Here, regions typically take the form of a Council of Governments (COG). For instance, the Association of Bay Area Governments (ABAG) is comprised of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, and Sonoma Counties and all the city governments within those counties, totaling 109 local governments.

The equation considers several factors including projected population, household population, and projected households. In addition, several adjustment factors, such as owner vacancy, renter vacancy, overcrowding, replacement, jobs-housing relationship, cost-burden relationship, State of Emergency, and feasible jobs-housing balance are applied to determine the regional housing need. This process is relatively procedural and does not tend to incite much controversy given the mathematically based method of assigning units to a region. Continuing the ABAG example, the region was assigned 441,176 units for the 8-year 6th Cycle Planning Period between January 31, 2023, and January 31, 2031.

The "local" allocation of the RHNA process is less dictated by statute or procedure, allowing each region (Council of Government or rural county) the opportunity to distribute housing units using parameters from State statute; however, HCD must approve the methodology used by each region to allocate housing units to local governments. Herein lies the opportunity for the Council of Governments to signal what is important to the region while balancing the requirements to allocate and plan for housing into the future. For instance, the San Diego Association of Governments took a simple approach to allocating the total number of housing units by allocating 65% of the units to jurisdictions with access to transit and the remaining 35% to jurisdictions based on the total number of jobs within the jurisdiction (SANDAG, 2020).

Beginning in 1969, the State Housing Element Law came into effect, which mandates local governments must adequately plan to meet the existing and projected housing needs of the community at all economic levels (HCD, 2024). This process, not heavily scrutinized in the past, has become increasingly controversial during the recent planning cycle. Through State Housing Element Law, local governments are required to submit the Housing Element chapter of their government's General Plan, a "local government's blueprint for meeting the community's long-term vision for the future", to HCD for review (Governor's Office of Planning and Research, n.d.). HCD reviews the document for consistency with statutory requirements and issues a letter of substantial compliance to the local government once all statutory requirements have been adequately satisfied. A letter of statutory compliance does not require the local government to build the allotted number of homes at the identified income levels, but it is a record that the local government has adequately planned for housing in the cycle. There have been six cycles (8-year periods for most local governments and 5-year periods for a handful of small, rural counties) to date with the sixth cycle having recently started. Housing elements due in 2021 (roughly three

years to the date when this master's project was written) have a compliance rate of 76%, indicating there are still nearly a quarter of jurisdictions due at this time that remain out of compliance.

The California Environmental Quality Act (CEQA) also plays an important role in the development of housing in California. Its purpose, at least at the outset in the establishment of the law, was to, amongst other factors, "inform government decision-makers and the public about the potential environmental effects of proposed activities" and "disclose to the public why a project was approved if that project has significant environmental impacts that cannot be mitigated to a less than significant level". In the context of housing, the latter is usually the most relevant to housing approvals and often requires some level of environmental clearance. Although legislative efforts, described in further detail in subsequent paragraphs, and local government efforts to streamline housing approvals have taken the form of exempting certain housing projects, some projects require environmental review in the form of an Environmental Impact Report (EIR). In addition to a description of the project, the draft EIR will sample the environmental conditions "pre-project", evaluate the environmental impacts of the project, and provide a discussion of project alternatives, among other considerations. Once these actions have been completed, the draft EIR is released for public comment at which point the lead agency (local government or project consultant) responds to specific considerations. At the conclusion of this process, the EIR is finalized and sent to the local government's approval body to approve the project or an alternative to the project.

A recent trend for local governments has been to prepare the EIR in conjunction with rezones, specific plans, form-based codes, or other types of CEQA streamlining ahead of a particular project being approved. Meaning, that local governments are getting ahead of

individual project environmental clearance and conducting this analysis at a larger scale, to streamline housing development. This is further supported by 223 unique jurisdictions across the State using HCD Local Early Action Planning (LEAP) grant funding to conduct some level of environmental clearance (HCD, 2024).

At face value, conducting environmental analysis for projects appears to be a net positive. A straw poll of Californians would most likely yield a concern for the environment as it relates to housing and other projects, though the tides have changed in recent years (Bonner, 2023). However, CEQA has routinely become a source for litigation to block, delay, or disapprove housing projects in California. In fact, between 2013 and 2015, 14,000 housing units were challenged in CEQA lawsuits. Of those units, 98% were in existing community infill locations, 70% were located within a half-mile of transit, and 78% were in noticeably more affluent areas of the State (Hernandez, 2018). In 2020, nearly 50% of California's annual housing production was challenged in CEQA lawsuits (Hernandez, 2022). More recently, the outlook on CEQA and housing has not become any clearer. In 2023, CEQA was used to halt the construction of student housing and permanent supportive housing for homeless individuals on site owned by the University of California, Berkeley (UC Berkeley) citing a lack of environmental review caused by the "noise" students create. From a housing perspective, it is abundantly clear that the use of CEQA to block, delay, or disapprove housing developments has strayed far beyond the original intent of the law and must be corrected.

The State of California's Legislature and Administration has spent the first half of the 2020s passing dozens of housing bills, with the Office of Governor Newsom (2023) reporting that 56 housing bills were signed into law in 2023. While significant strides are made in this realm, local jurisdiction (cities and counties) planning staff are often left to digest, interpret, and

implement multiple changes to housing laws every year, often with minimal direction from bill language, the Administration, or the Department of Housing and Community Development (HCD). Staff must then communicate these changes to elected or appointed bodies in housing approval meetings, which usually have some form of project presentation, public comments, elected official comments, and voting on the proposal. Considering the significant legislative efforts to streamline and simplify the housing approval process, local jurisdictions continue to act, or inaction, contrary to State Housing Laws regarding housing development. While it is reasonable to suggest blame resides with elected officials rendering decisions on housing projects, I argue that the housing approval process bears equal blame for actions against housing at the local level.

It is precisely these housing approval meetings, or the process to receive housing approval, which this culminating project focuses on. Specifically, this master's project will look at typical approval processes, why these are used, identify their shortcomings, and offer suggestions to improve the approval certainty of a housing project. Ultimately, this review of emerging literature, common pitfalls, and best practices will lend itself to a practical guide for local land-use planners across California to implement in the housing approval process.

To combat decisions that might run contrary to housing, the Legislature 25 units in the 2021-2022 state budget to establish the Housing Accountability Unit (HAU) within HCD. This unit is tasked with enforcing various state housing laws, such as Housing Element Law, Housing Accountability Act, and Accessory Dwelling Unit Law, amongst others (HCD, 2021). In addition, these efforts are further supported by the Department of Justice's (DOJ) Housing Strike Force, a unit of attorneys tasked with enforcing state housing development laws (OAG, 2021).

In the remainder of this report, I include sections that first cover the relevant literature on housing development, with a focus on the housing approval process in California. This review of literature will encompass both academic and non-academic pieces. Next, I will provide an overview of five cities in California and describe the processes that either streamline or hinder the approval of housing. Drawing from these case studies, I will propose suggestions on how to accelerate housing approvals, at the pre-hearing and hearing stages. Last, I will interview key figures in the housing field on the proposals to solicit feedback on the appropriateness and difficulty of implementing the proposals. My concluding section includes my response to the stakeholder interviews.

2. Literature Review

This section offers an overview of the literature related to the housing affordability crisis and housing approval processes. Specifically, I will delve into a brief history of zoning practices in California, describe the Not In My Backyard (NIMBY) sentiments that tend to arise regarding the approval of housing, and best practices in zoning and development processing to encourage housing.

California Zoning Practices Overview

Historically, land use decisions in California, with some exceptions such as the Tahoe Regional Planning Agency and the California Coastal Commission (Act), have been made at the local government level. Every city and county in the state must adopt a general plan with mandatory elements such as land use, circulation, housing, conservation, open space, noise, and safety, and give these elements purpose by making land use decisions consistent with these elements (SGF, n.d.). With deference given to local governments, it is no surprise that land use regulations vary differently across the state.

Academic literature regarding the local land use entitlement process in California suggests multiple areas need some level of improvement to streamline development. O'Neill, Gualco-Nelson, and Biber's (2018) review of Bay Area land use entitlement processes provides several key findings regarding inefficiencies in the housing approval process. First, the research shows that nearly all jurisdictions require discretionary approval for projects involving two or more units; it should be noted that with recent housing legislation this has changed, such as the introduction of Senate Bill 35 and the Housing Accountability Act, but the context of how recent significant impediments existed is of note. In addition, projects could be subjected to multiple instances of discretionary review. For example, the authors provide a table showing the total number of land use/planning approvals exceeding the number of projects in each jurisdiction, meaning that the same project might be required to receive multiple intermediate approvals before receiving a final approval.

Amongst the findings made by Wassmer and Wahid (2019), the authors describe the impacts of the California Environmental Quality Act on housing production in the state. As previously stated, housing developments, through CEQA, could be required to file an Environmental Impact Report (EIR), opening the potential for competing interpretations of the environmental effects of a housing development.

Not In My Backyard (NIMBY) Attitudes Towards Housing

The housing approval process offers many entry points for opposers of housing development to intervene. Not In My Backyard (NIMBY) is the term coined to categorize individuals, usually homeowners, who actively combat the development of new housing or the enactment of pro-housing policies. In addition, NIMBYs can also be elected officials who either through their own beliefs or under pressure by local activists, support anti-housing policies

(Lewis and Neiman, 2002). Interestingly, Lewis and Neiman (2002) also conclude, based on interviews with elected officials, that most elected officials would present as pro-growth or neutral on growth if external pressures were controlled.

Wassmer and Wahid (2019) describe some of the reasons why NIMBYism might be prevalent in California housing development. The authors cite reasons given such as the future residents of affordable units, who likely will be of lower socioeconomic status, as a reason for NIMBY perspectives on new housing. In addition, other reasons why NIMBYs might oppose the construction of affordable housing in their neighborhood could be linked to the impact on infrastructure, such as the impact on local schools. These fears of the impact of additional housing on schools are further confirmed by a, albeit small, survey (Anson, 2020).

Conversely, Monkkonen and Manville (2020) offer a different perspective on NIMBYism. The authors suggest that anti-developer sentiment, and not solely residents of new housing, is a source of opposition to new housing. A survey conducted on 1,300 Los Angeles County residents found that when prompted with four responses, traffic and parking, neighborhood character, strain on services, and developer profit, survey respondents chose developer profits as their first choice against new housing. Further, when told a developer will likely earn a large profit, opposition to the new housing increased by 20 percentage points. Lastly, the finding made by the authors regarding potential methods to alleviate NIMBY attitudes revolves around providing community benefits. For example, if a project provides street improvements or a park, that might lessen NIMBY's views on the project.

Iglesias (2002) provides insight into concerns that NIMBYs typically cite when opposing new housing development. Citing two separate multiyear studies of the San Francisco Bay Area housing approval process, NIMBYs will often describe the potential negative effects on their

property values, appearance and density of the proposed project, land use issues, and the process for the approval of the housing. Tactics that NIMBYs will use to fight the approval of housing projects are organizing residents against the project, contacting the media, and lobbying local government officials and staff.

Non-academic literature also emphasizes the role NIMBYs have in the housing approval process. Dougherty (2020) describes NIMBYs as, in part, "angry neighbors" with sufficient time to attend meetings during the standard 9-5 workday to oppose housing developments. Einstein, Glick, and Palmer (2020) equate who we consider NIMBYs to "neighborhood defenders". These individuals tend to be motivated, usually with some status (e.g., homeowners) to prevent new housing. Einstein et al. (2020) go beyond simply analyzing NIMBY-type attitudes and dive into the local institutions, participation disparities, and political inequalities that perpetrate housing not being built.

I would be remiss to ignore the impact of the fiscalization of land use in California. Most cities and counties in California receive their tax revenue from two sources: property tax and sales tax. With the passage of Proposition 13 in 1978, which limited the amount of revenue local governments could draw from property taxes, sales taxes became the primary source of tax revenue for local governments. As noted by Fulton and Shigley (2018), this might lure local governments away from the zoning for a balanced community, and focus on revenue-generating uses, such as zoning for commercial and retail uses.

This section provided an overview of relevant literature related to zoning practices in California and NIMBY attitudes. The next section will provide examples of how local governments approve housing.

3. Local Government Review and Case Studies

Now that we have reviewed an overview of California zoning practices and NIMBY attitudes, I will describe the housing approval process generally and provide examples of how certain local governments in California approve housing.

Local Government Housing Review Overview

Before diving into individual jurisdictions and how they conduct housing approvals, it is important to review typical approval processes that exist at the local government level. Housing approval processes, while different across the different local jurisdictions in the State of California, tend to have the same core components. First, the planning staff will give a presentation on the proposed housing development. Next, a comment period is opened to the public to solicit feedback on the project. Third, the decision-making body will give their feedback, culminating in the fourth and final step of voting on the proposed housing development. However, what further complicates the housing approval process are the steps often needed to get to this last approval stage and the reasons why housing proposals need to get voted on in the first place.

Planning staffs across the State will also vary, given the context of their community, which also has a profound impact on the approval of housing. For instance, similar communities in terms of population in Los Angeles County have vastly different goals with their planning departments; San Marino, a more affluent community, invests more in senior-level planning staff with the ability to design and implement new policy, while Commerce, a majority-Latino and socioeconomically disadvantaged community focuses their staff resources on code enforcement and other compliance (Schuetz, 2022). This puts jurisdictions with smaller planning staff at a

disadvantage as there is not sufficient staff capacity to keep up with the constantly evolving state housing legislation.

Housing projects will almost always have a review ahead of the final determination in the form of a staff-level review, a minor design review board or committee, or a Planning Commission hearing. While these can be valuable tools for developers to solicit feedback, they also present an opportunity for community members who oppose housing to have their opinions heard by decision-makers. Small-town politics is real for many jurisdictions in the State, and a vote supporting housing, contrary to the desire of homeowners residing within the community, could place local elected officials in a precarious position.

Local Government Case Studies

The following is a sample of the housing approval process in select local governments in California. I have chosen the Cities of Berkeley, Poway, Mission Viejo, Sacramento, and San Francisco for my case studies. These jurisdictions either capture how my proposals (in Section 4) are currently being implemented or demonstrate a need for how current housing approval and permit processing are serving as barriers to housing development. While these jurisdictions do not represent all the possibilities on how housing is permitted in California, which with 539 local governments makes it difficult to track and categorize similar jurisdictions, they do capture some of the more prominent themes.

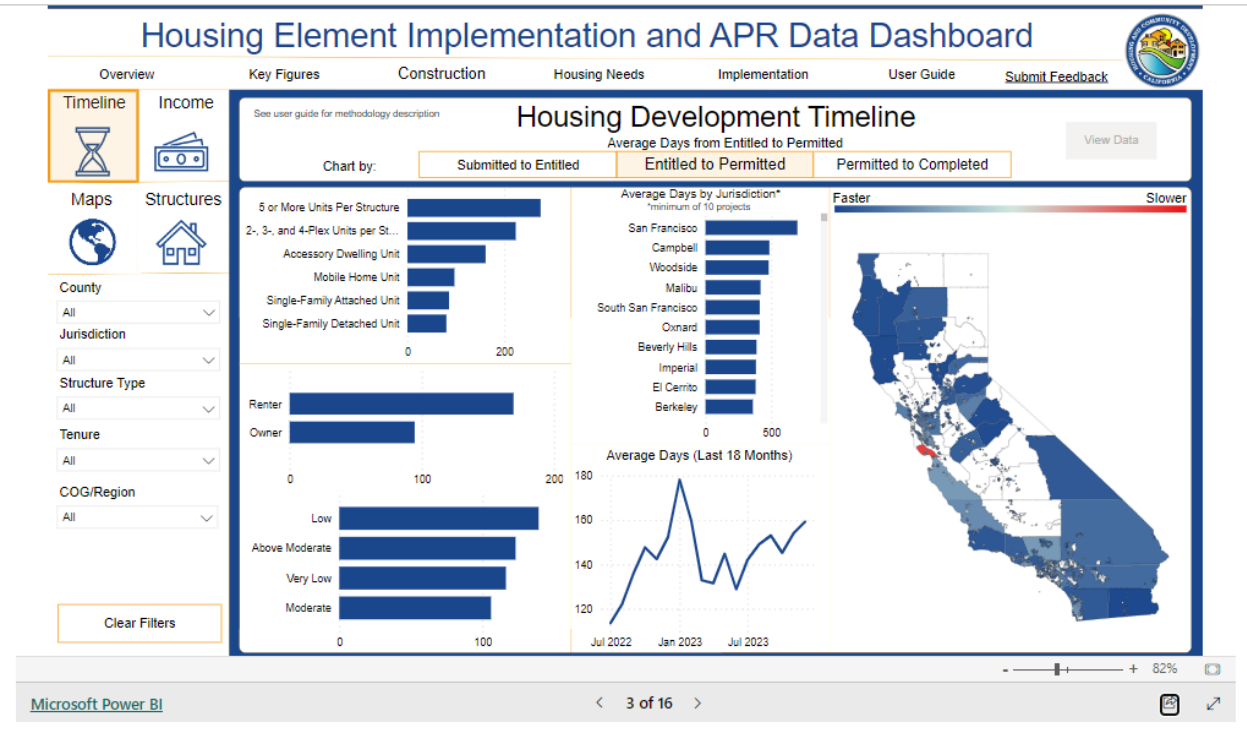
Berkeley

As previously noted, housing approvals almost always go through some level of pre-hearing review. For example, looking at the City of Berkeley's permit and processing procedures, multifamily housing projects (3 or more units) require a Use Permit (UP) in multifamily zones. This process typically takes 9 to 24 months and is approved by Berkeley's

Zoning Adjustments Board (ZAB), a 9-member public body appointed by the Berkeley City Council to administer the Zoning Ordinance. Amongst other criteria used by the ZAB to approve projects are whether the proposed project "will not be detrimental to the health, safety, peace, morals, comfort, or general welfare of persons residing or visiting the area or neighborhood of the proposed use", a standard that is subjective and difficult to assess for consistency.

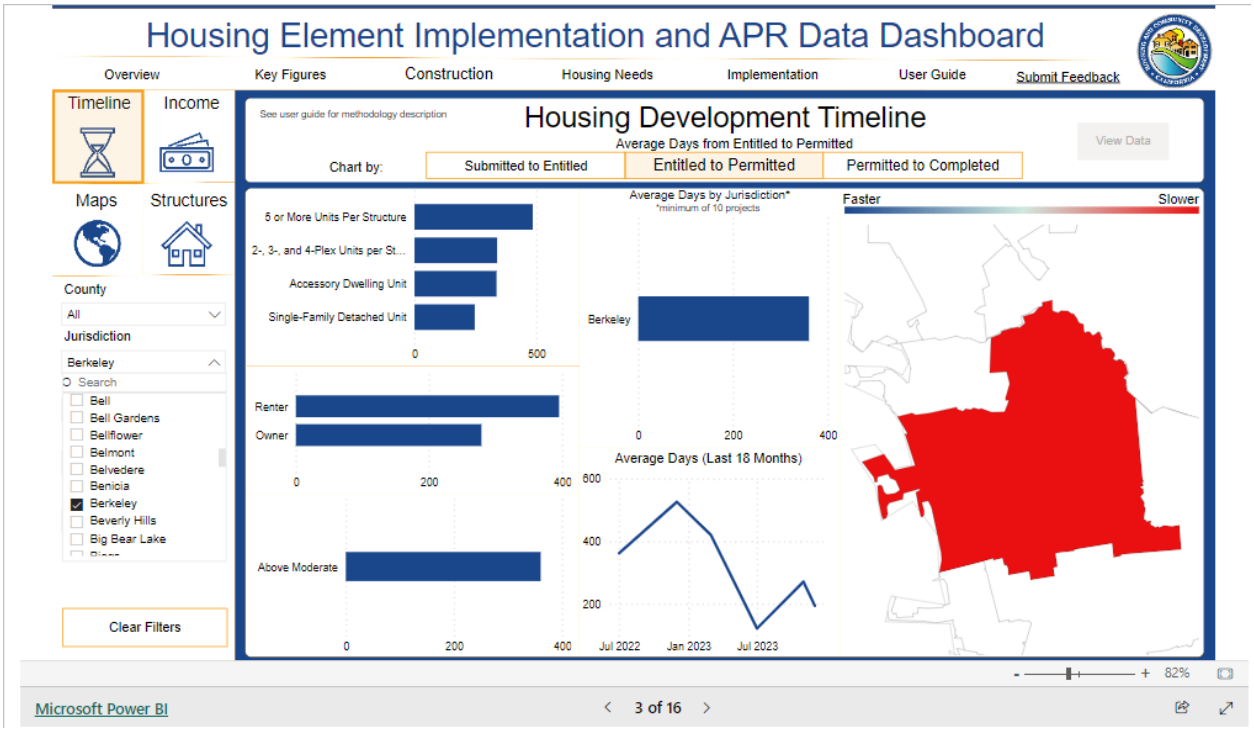
For the City of Berkeley, although the City has permitted a decent amount of housing, the City takes nearly a year to permit projects, which is a significant delay in the process. As shown in Figure XX using HCD Annual Progress Report Data, the City ranks as the 10th slowest jurisdiction to permit housing in the State. A myriad of factors could be at play but the Use Permit requirement and the requirement that projects be heard by the ZAB could be contributing factors.

Figure 1



(HCD, n.d.-a)

Figure 2



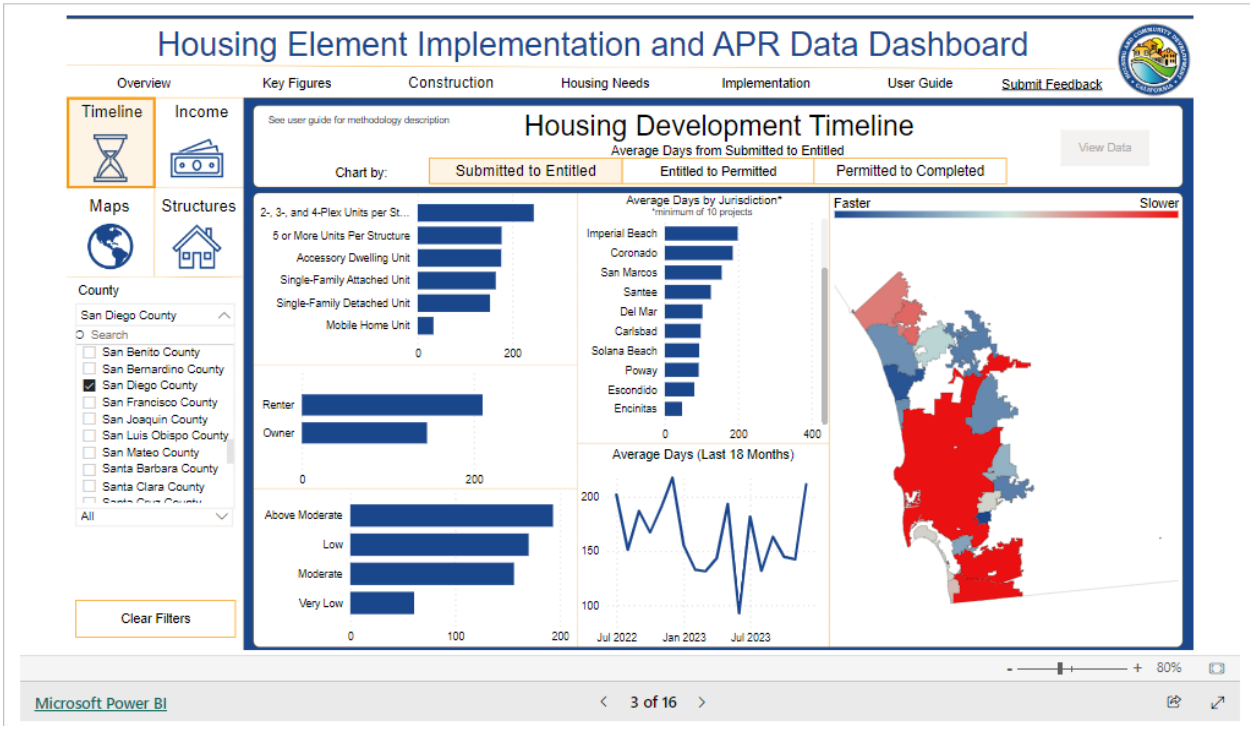
(HCD, n.d.-a)

Poway

The City of Poway, conversely, takes a different approach to housing approval projects, leading to a streamlined approval process. The City does not have a Planning Commission or any design review committees, meaning housing approvals only need to be heard by the City Council. Next, the City has implemented a Development Review Committee (DRC) which is comprised of City Planning staff, Engineering staff, and a representative from the Fire Department and Public Works Department and meets every week. Additionally, the City offers two free services to developers: a pre-application and a pre-development conference. The pre-application process essentially reviews the project for compliance with the existing Municipal Code, identifying areas where revisions would be necessary before formal submittal. The pre-development conference (PDC), however, is perhaps the more valuable of the two options. The

PDC process allows staff to bring a development proposal to the City Council for feedback, allowing City Councilmembers to provide non-voting feedback to the applicant to address any potential concerns regarding the project. An added benefit is the ability for the public to see a project and not be "blindsided" as often the anti-housing rhetoric suggests. The entirety of the Poway housing review process is typically six to ten weeks, significantly less than other comparable jurisdictions, offering an alternative to a 100% ministerial process.

Figure 3



(HCD, n.d.-a)

Mission Viejo

The City of Mission Viejo created a set of objective design standards in June 2023. Objective design standards, described in more detail in the next section, are a set of standards used for the evaluation of a housing project that involves no personal or subjective judgment by the approving public official or public body. In addition to specific requirements in state statutes

requiring the use of objective design standards, local governments have opted to establish objective design standards as it expedites the housing approval process by minimizing the back-and-forth of a housing developer attempting to adequately respond to sometimes confusing and unclear design standards (Hanson Bridgett, 2021).

While it might be too early to report meaningful benefits from the program, the City adopted objective design standards as a means of balancing local control over land use projects, while meeting new State requirements. As noted in the meeting to adopt the standards, there were positive comments received from the development community as to the benefits of the objective design standards relating to cost, feasibility, and predictability of outcomes (City of Mission Viejo, 2023). In addition, given the proposed legislation for the 2023-2024 legislative cycle, objective design standards will continue to be a popular housing streamlining mechanism (California Legislative Information, n.d.). Therefore, it is beneficial for local governments to act and establish objective design standards ahead of legislation that might require standards that are not as favorable to the local government.

Sacramento

The City of Sacramento has streamlined housing approvals by exceeding State requirements for the ministerial approval of infill housing. For example, the City has removed the 10% affordability requirement for larger projects and the prevailing wage requirement, both of which affect the financial feasibility of a project being built. In addition, these infill housing projects benefit from objective design standards that provide developers with a more certain and constant effective review process (City of Sacramento, 2020).

San Francisco

Unlike some of the other local governments mentioned in this section, the City of San Francisco serves as an example of how to successfully stifle development within a local jurisdiction. Referencing HCD's October 2023 "San Francisco Housing Policy and Practice Review", HCD had 27 key findings on how the City needs to improve its permitting process from the conceptual and pre-application process through the issuance of a certificate of occupancy. The study, completed in conjunction with the University of California, Berkeley's Moira O'Neill, was a year-long assessment of the City's practices and included interviews from the San Francisco Board of Supervisors and Planning Commission, as well as City staff, community-based organizations, housing advocates, affordable and market-rate developers, and attorneys.

The Policy and Practice review for the City of San Francisco was prompted by the City's update of the Housing Element and due to San Francisco having the longest timelines in the state for advancing a housing project from submittal to construction. Using HCD's 2022 Annual Progress Report (APR) data, it takes 523 days for a housing project to be entitled and an average of 605 days for an already-entitled project to receive building permits, which would rank San Francisco as the slowest jurisdiction in the state in both these categories (HCD, 2023). As noted in the City's housing element findings letter, given the significant impediments to housing approvals in the City's permitting procedures, it triggered an in-depth review not typical of the housing element review process.

The findings were categorized into the following: Inconsistencies with State Laws, Historic Inequities in Planning and Zoning Decisions, Senate Bill 35 and Overall Affordability Trends, Problematic Local Implementation of the California Environmental Quality Act

(CEQA), Publicly Initiated Discretionary Review, Public Hearings and Development by Negotiation, Procedural Complexities, and Politics and Stakeholder Disagreements. Within these categories were instructions to make amendments to specific City policies or practices that lead to the delay of housing approvals within the City. For example, one required action involves revising local practices to remove post-entitlement appeals for projects that have received ministerial approval, such as projects that were approved using SB 35 ministerial approvals or Accessory Dwelling Units. In addition, another required action is for the City to eliminate projects that are code-compliant to have a Planning Commission hearing. Lastly, another finding of relevance is to prioritize the City's update of objective design standards and replace any residential design standards that involve subjective standards and requirements. As described in further detail, these suggestions from the San Francisco Policy and Practice review and practices in place in other jurisdictions are the policy recommendations I suggest be implemented by local governments to approve housing more efficiently. The next section will describe my proposals to local government planners to streamline housing approvals within their jurisdictions.

4. Recommendations

Through the research and case studies, I have identified what I believe to be functional recommendations implementable with relative ease, even when incorporating political considerations. This section will provide four recommendations to evaluate. While most of the literature on macro-level housing reform revolves around the presence, or lack thereof, of the availability and presence of financial incentives to develop housing, I have focused my recommendation on the process by which the local government approves housing. The local government hearing process can hinder projects from full build-out, even when they are approved and compliant with local regulations, such as the 469 Stevenson project in San

Francisco (YIMBY Law, 2022). The City's Planning Commission approved this project, but it was denied by the Board of Supervisors through loose arguments made by the EIR on the grounds of gentrification; the site was previously a parking lot. While that is not to say there is not a cost associated with implementing these recommendations, it would be a small, one-time commitment in most cases by a local government.

Increase the use of Objective Design Standards

The use of objective design standards, or "A design standard that involves no personal or subjective judgment by a public official and are uniformly verifiable by reference to an external and uniform benchmark or criterion…", could expedite housing approvals and minimize the need for contentious housing approval meetings (Malisos, 2023). With subjective design standards, which many local governments in California currently use, developers must propose projects that meet general guidelines, without knowing how exactly to meet the requirements. For example, the City of San Mateo previously utilized a design guideline regulating the height of "single and multi-family buildings where height and width scales are incompatible" (Steuteville, 2022).

Using standards that are non-discretionary and uniform, housing projects face less uncertainty at the time of evaluation, ultimately resulting in a facilitated review and approval. As described above in the City of Mission Viejo example, local developers generally seem to be in favor of consistent standards.

A potential drawback in the use of objective design standards is precisely the lack of flexibility to meet these standards. While a developer could opt out of using objective design standards, it comes at the risk of a longer, discretionary review process. Given objective design standards are measurable and predictable in outcomes, these standards prevent developers from

providing additional components, aesthetic or otherwise, that could be desirable. Another drawback, though mitigated through the adoption and preparation of the objective design standards, are the standards used. It is not unreasonable to think that if the only method for elected officials to evaluate projects is using objective standards, changes in the elected body could prompt changes in the standards applied. This process would be costly and time-consuming and would result in the politicization of said design standards. It is also important to note that the use of objective design standards can be implemented across the affordability spectrum, with some exceptions granted for projects using density bonus or other local programs promoting unit affordability.

Figure 4

Examples of Guidelines and Standards

Design Guidelines	Design Standards
Provide articulation to reduce the apparent mass and scale of the building and to be sensitive to the neighborhood.	At intervals of at least 100 feet of building length, there shall be a plane break along the facade composed of an offset of at least 5 feet in depth by 25 feet in length. The offset shall extend from grade to the highest story.
Rooftop mechanical equipment *should be* screened from public view by a parapet wall, decorative equipment screen, or other architectural treatment.	Rooftop mechanical equipment *shall* be screened from public view by a parapet wall, decorative equipment screen, or other architectural treatment.
Provide ample width and design for universal access along pathways and walks.	The paved section of sidewalks shall be at least 8 feet in width.

(HCD, OPR, PlaceWorks, ILG, Ascent, & Provost & Pritchard, 2021)

Implement the Use of Pre-Application Meetings

As noted by Einstein et al. (2020), the accumulation of land use regulations could often trigger community (public) reviews of multifamily housing developments, thus allowing multiple opportunities for the public to voice their displeasure against these housing developments. In California, as previously noted, housing approvals could take form in an initial Planning Commission hearing with follow-up meetings should the Planning Commission have additional questions for the developer or planning staff. Should a project require approval from the elected body (City Council or Board of Supervisors), the project could be subject to

additional public hearings on the project. In this scenario, the public would have an opportunity to voice their displeasure with this housing development at multiple points in the approval process.

The solution I propose would be to minimize the number of times a project is heard at a public hearing and establish "pre-application" meetings between the developer and City staff. Typically, these meetings involve more City staff than just Planning staff and can include Engineering, Public Works, Police, and Fire staff to review all project considerations.

In practice, local government planning staff would have to propose an amendment to the local Zoning Code to allow developers to opt into these pre-application meetings. These pre-application meetings, from my knowledge of reviewing over 75 housing elements across the state, tend to be free services provided by the local government to interested developers. The elected body would then have to approve this process change, which could lead to some hesitation from the elected body to relinquish control over processing housing approvals. Seemingly as with all things related to housing, this could be a point of contention and could easily become a sensitive political issue depending upon the local government.

To mitigate concerns from the elected body on relinquishing control over the approval of housing developments, there are multiple variations to how to implement this proposal. One option is to have the pre-application meeting solely between the applicant and City staff. In this scenario, the applicant would submit the project and City staff would evaluate the project based on design and development standards currently in place. As noted, the benefit to the applicant would be to hear from City staff regarding consistency with the Zoning Code requirements without the influence of elected or appointed officials. Another alternative, as noted by the City of Poway, would be to use the pre-application process to present the preliminary project to the

approval body for their feedback on aspects of the application (City of Poway, n.d.). Ultimately, since this proposal does not change the body that approves the project, this would be a reasonable compromise and worthwhile to solicit feedback from the body that would ultimately approve the project.

From my perspective, the ideal implementation of the "pre-application" process would combine the use of objective design standards and a meeting that would only involve the applicant and City staff. This would reduce the opportunities for not only the public but also elected or appointed officials to intervene in the process while remaining consistent with the Zoning Code. As noted by Einstein et al. (2020), land use regulations and the processes by which these regulations are acted on gain their power, in part, "from the people who use them to their advantage". The removal of even a portion of these regulations, naturally, would be a cause for concern for the public, especially those with anti-housing opinions.

Increase Education about Legal Requirements

When ruling on housing development applications, there are often numerous housing laws that could be in play, including, but not limited to the Housing Accountability Act, Permit Streamlining Act, SB 35 Ministerial Approvals, etc. The rhetoric on housing has changed significantly in recent years with the passage of these legislations, but there is not a consistent method by which to communicate legal requirements to approval bodies and the public. Local governments will often only communicate these requirements at the time of the hearing, which, while informative, often results in significant pushback from the elected officials and opens the potential for political grandstanding.

Therefore, this proposal would require local government planners, as part of the agenda packet, to explain any legal requirements that are associated with the project. In practice, the

satisfaction of this occurs through a clear statement in the agenda packet ahead of the meeting for both the public and approving body to read ahead of the approval meeting.

The main basis for this proposal stems from a report by Elmendorf et al. (2020) which describes the legal ramifications of inaction on General Plan Housing Elements. Given the enforcement authority for HCD on Housing Elements and delays, stalls, and denials on housing projects stem from the same housing law (Housing Accountability Act), the report has significance as the smaller scale of individual project decisions. The authors describe that with the strengthened framework of new housing legislation and a unit within HCD to enforce housing laws, local elected officials are in a bind when it comes to deciding on housing issues. Such is the strength of enforcement on housing issues that often the only way to preserve local control of housing within a jurisdiction is to comply with these State-imposed requirements.

Ideally, making the legal requirements for approving a project would prompt elected officials to approve the project. However, as seen with the recent litigation between the State of California and the City of Huntington Beach, detailing the legal requirements for housing approval does not always result in compliance by local governments (Biesiada, 2024).

Expanding the Types of Projects Eligible for Ministerial Approval

To truly expedite the housing development process, expanding the types of projects eligible for ministerial approval is perhaps the strongest tool for local planners. By removing the public hearing requirement for projects, housing projects would not have to face scrutiny from the public and instead will be evaluated on the merits of the project by City staffers who are well-versed in requirements. For purposes of this proposal, I am defining ministerial approval as an approval that does not require any deliberation (hearing) by an approval authority, such as a Zoning Board, Planning Commission, or City Council.

It is no surprise there is a link between the number of Accessory Dwelling Units permitted across the state and recent legislation aimed at providing a streamlined, ministerial approval for this housing type. According to HCD Annual Progress Report Data, ADUs accounted for nearly twenty percent of the total housing permits issued in the state in 2022, up from roughly 3% in 2018 (HCD, n.d.-a). This translates to 25,130 ADUs in 2022 and 8,893 ADUs in 2018. ADUs bypass the local government's discretionary process and, by law, must be approved within 60 days if they meet the objective design criteria (HCD, 2022). Additional units added subject to Senate Bill 9 (SB 9) also have the benefit of being subject to ministerial approval.

This proposal would expand the ministerial approval of housing to several housing types, including larger multifamily residential projects. Currently, the ministerial approval of multifamily housing involves projects that invoke Senate Bill (SB) 35 streamlined approvals. SB 35 (2018) allows developers to apply for streamlined approvals in jurisdictions that have not met their RHNA targets. This proposal would also allow for projects to bypass CEQA and any requirement to do an EIR. As seen with the opposition to SB 35, which marked one of the first housing streamlining bills to bypass CEQA, the allowance for projects to bypass environmental review will create stiff opposition (Habitat for Humanity, n.d.). I will discuss this opposition in further detail in the stakeholder interview and concluding sections. Last, this proposal would not call for local governments to impose a prevailing wage requirement or include any affordability requirements to receive ministerial approval. As noted in a UC Berkeley Terner Center report, prevailing wage requirements add up to $30 more per square foot than those without wage requirements (Raetz et al., 2020). Thus, removing this requirement can make projects more financially feasible for developers.

Manji and Finnigan (2023) provide an in-depth overview of SB 35 and the positive results of the bill. Given that 501 of 539 jurisdictions were subject to some level of streamlining, this bill has had a significant benefit in terms of units, over 18,000 units from 2018 to 2021, the period in which SB 35 first was available for use. As noted by the authors, SB 35 can streamline the entitlement process by about a year due to the limited ability of local governments and elected officials to dictate certain conditions and standards that it otherwise could through the standard discretionary process. However, due to provisions of SB 35, namely the requirement to pay prevailing wages, the effectiveness of SB 35 is limited to affordable housing projects receiving public funding, which also has a requirement of paying prevailing wages.

The proposal to expand ministerial approvals to non-SB 35 multifamily projects has benefits. From a practical perspective, housing entitlements are expedited when larger multifamily projects do not have to go through several iterations of public review. Next, there is potential to pair ministerial approvals with other locally-based requirements and incentives, such as an inclusionary housing requirement or density bonus.

The drawback to this proposal is the significant buyoff needed for the existing approval body to relinquish such authority. I'd argue that these approvals might work in large jurisdictions. Large jurisdictions are likelier to be receiving a higher volume of applications. With this, there is an opportunity for ministerial review of housing projects to occur for projects that are smaller in scale, for example, 2-50 units. As time evolves and planning staff can manage these proposals, there is an opportunity for a gradual progression of ministerial approvals for larger projects (50+ units).

This section reviews the proposals that I have put forth regarding methods to streamline housing approvals. The next section will test these proposals by incorporating stakeholder

feedback regarding the respondent's overall thoughts on the proposal and the feasibility of implementation.

5. Interviews

To gauge the effectiveness of the proposals and the feasibility of implementation, I interviewed a local government advocate, two former local government planners, one who previously worked for a City, another who previously worked for a County, and a State housing policy specialist to solicit their insights. I formatted the survey by asking the respondents for their overall thoughts on the proposals, knowledge of the proposal, and the feasibility of implementation, rated on a scale from 1-10. Respondents evaluated the four proposals: Implementation of Objective Design Standards, Implementing the use of Pre-Application meetings, Increasing the Education Around Legal Requirements, and Expanding the Types of Projects Eligible for Ministerial Approval. I asked respondents to share as much as they were comfortable sharing and several respondents participated under the agreement of anonymity. This section covers the responses provided by respondents and my response to the feedback provided.

On the topic of implementing objective design standards, there appeared to be consistent support for implementing this proposal. For example, the former local government planners voiced support for the use of objective design standards as a means of increasing the consistency of projects submitted for approval. While objective design standards are beneficial to the developer in knowing whether their project can be approved, the local government planners also benefit from having a consistent set of objectives to evaluate projects. This streamlines the government review of the project, ultimately leading to more consistent and predictable results in approving housing. The local government advocate I interviewed also supported the use of objective design standards citing recent legislation that requires the use of objective standards to

approve housing projects and a desire for governments to maintain some level of local control. By implementing objective standards, local governments can provide for high-quality site and building design while simultaneously preserving the character of their neighborhoods.

A few of the concerns that arose on the topic of objective design standards involved the financial or staff cost of producing the objective standards, especially for smaller jurisdictions in the state. For example, while 199 jurisdictions applied for Senate Bill 2 (SB 2) Planning Grants Program funding to establish objective design and development standards, these funds were a one-time offering from the State to assist in the development of these standards. Additionally, the former County planner suggested that implementation for larger jurisdictions, as is the case with counties, can be difficult due to the different types of governing policy documents for communities. For example, County governments might tend to administer their Zoning Code through either Specific Plans or Community Plans that cover a geographic area within the County. Since communities in unincorporated counties are isolated from one another, it is therefore more efficient to have zoning standards tailored to that community instead of a Zoning Code that treats all communities the same, as is typically the case for a City. Because of the multitudes of Specific Plans or Community Plans, the former County planner notes, it would take a significant amount of political will to change the design standards for each community and implement objective design standards. In turn, this would limit the feasibility of implementation.

Regarding the use of "pre-application" meetings for housing projects, I received mixed feedback. While local government planners relayed that these meetings can be helpful to minimize the need for several iterations of feedback, unlocking a benefit from these meetings would largely depend on how the local government chooses to implement the pre-application meetings. For instance, if the pre-application meeting is solely a meeting between the local

government and the project developer, the standards for approval must be objective to guarantee success when the project advances to approval hearings. In this vein, the former County staff planner notes that pre-application meetings can occur at various stages of the development process. However, the County staff planner notes that the use of pre-application meetings is beneficial to prevent the project from getting "too far down the road" and having to scale back the project. Likewise, as responded by the local government advocate, the pre-application meeting encompasses all the necessary local government departments to be truly beneficial. This could mean that the meeting might have to extend beyond planning and development staff and require the involvement of engineers, police, fire, public works, and other facets of local government. While there might not be a financial cost for the local governments, it would divert staff resources away from other projects or responsibilities, so the use of the pre-application meeting should be as efficient and all-encompassing as possible. Similarly, the state housing policy specialist respondent stated that oftentimes, although well-intentioned, pre-application meetings could impose another layer of review by local government planning staff. For example, if the standards used by local government planning staff are discretionary and open to interpretation, this could lead to staff essentially dictating how a project is designed, adding a layer of constraint to the developer.

The option of increasing education on the local government's legal requirements appeared to be well-received by survey respondents. The former local government planners stated that this was often an issue that staff had to contend with when dealing with housing approvals and having an increased focus on describing the local government's legal requirements would have been helpful. The respondents also described the difficulty in diffusing knowledge given the elected or appointed official's limited time to review all the documentation ahead of

time. The former county planner noted that the county offered briefings for approving officials to alleviate some of the potential knowledge barriers. In addition, the county planner noted that with frequent updates to housing laws, the burden to keep up with the legislation could become too great for planning staff and would usually fall onto regional or state-level technical assistance, such as through the League of California Cities, Institute for Local Government, or HCD. While the information surrounding legal requirements is often in the agenda packet, it can get buried under the relevant project information and is not at the forefront of the conversation. Thus, from the local government planner's perspective, a concerted effort on the legal requirements and ramifications for approving or disapproving a project could be beneficial to fully describe the requirements for local government officials.

Similarly, the local government advocate supports increasing the education around the legal requirements for officials on approving housing developments, centering on the duty planning commissioners and city council members have in the process. The local government advocate cites that, with the rapid changes in state housing laws, these approving officials might not always be in tune regarding the limitations of their decision-making authority, whereas local government planners have expertise since they are regularly working on these projects. Educating these officials has the additional benefit of also educating the public, as it is conceivable that most of the education would happen in the public hearing or as an informational item in the agenda packet made available ahead of the public hearing. Lastly, in addition to points made by the former local government planners and local government advocate, the state housing policy specialist cites the increased capacity of HCD's Housing Accountability and the DOJ's Housing Strike Force as key reasons to educate approving officials. Given the additional opportunities for whistleblowers to make complaints about anti-housing actions, it is prudent for

local government planners to be transparent to approving officials about the ramifications of anti-housing actions.

Perhaps the most polarizing of the proposals was the expansion of projects eligible for ministerial approval. From the local government planner's perspective, admittedly those with 'pro-housing' attitudes, expanding the projects eligible for ministerial approval is "*the gold standard* [emphasis added]". By allowing projects to bypass environmental review, most of the "entry points" for projects to be stalled, delayed, or denied are removed, allowing for housing projects to be approved with relative ease. These sentiments are the same for the state housing policy interviewee as they have, in the review of several housing elements, noted that jurisdictions with expanded ministerial approvals have a much more streamlined housing development pipeline and fewer issues when it comes to delays from public hearings.

The former county planner offered a unique perspective regarding how the expansion of types of projects eligible for ministerial approval would operate in practice. While expanding the types of projects eligible for ministerial approval could certainly expedite the approval process for planning staff, absent an expansion of exemptions for environmental review, the proposal for ministerial approval would lack significant benefit should it not address the associated environmental review.

The local government advocate respondent, however, offered a different perspective on the proposal. By essentially eliminating any discretionary review, the proposal would significantly alter a local government's ability to plan for itself when planning for services and infrastructure. Moreover, this proposal could have unintended consequences in the form of local governments reducing the land zoned for residential development to preserve what little discretion the local government could control over land uses. In the lone dissenting thought held

by a former local government planner, this proposal not having an affordability requirement would remove the only leverage currently held by local governments in the processing of housing projects wanting ministerial approval. For instance, the current requirement for projects under SB 35 to have greater than 50 percent of the total project units be affordable to lower-income families is a strong incentive to not only build more housing but also affordable housing. The proposal as written would disincentivize the construction of affordable housing units as it bypasses the ministerial approval and affordability trade-off currently in place.

This section summarized the interview responses I received. Based on the interview responses, the proposal to increase the use of objective design standards and educate approving officials on legal requirements for housing decisions appeared to be the consensus choice. In addition, three of four respondents cited expanding the types of projects eligible for ministerial approval as their preferred choice, with the lone exception being the local government advocate. Lastly, the use of pre-application meetings garnered mixed feelings of support as some too many variables and complexities could be associated with its use.

6. Conclusion

Based on the responses gathered from the stakeholder interviews, promoting the use of objective design standards to review housing development projects, and educating housing approval officials appear to be the favored proposals for local government planners to implement. These proposals strike a balance between streamlining housing approvals, by reducing the time needed to review the housing project, and maintaining local control, by allowing the local government to establish the standards by which it will evaluate the project. However, to ensure I am evaluating all aspects of the proposals, I use a quantitative criteria-

alternatives-matrix to encapsulate all relevant factors. This section will evaluate these proposals and provide suggestions to local government planners.

As noted in Figure 5, the matrix shows the proposed alternative on the vertical column and the evaluative factors on the horizontal axis. I weigh the factors based on importance in the following order: political acceptability, equity in producing more affordable units, administrability, and cost-effectiveness. I weighed political acceptability the highest as these proposals will need to be approved by an elected body, in the form of a City Council or Board of Supervisors. As such, including the likelihood of proposals being accepted by these elected bodies is paramount for a local government planner to suggest changes. Next, I look at the equity of the proposal in producing more affordable units. I decide this is the second most important as the proposals should provide a tangible benefit of getting more units built. Third, I chose the administrability of the proposed alternatives as local government planners will take on most of the work and the proposals should be mindful of staff capacity to create, implement, and maintain the proposals into the future. Last, the cost-effectiveness of the proposals is the least weighted option given the varying costs of the proposals. For instance, where the proposals might require financial investment, HCD has a variety of existing technical assistance available to reduce or remove the cost altogether (HCD, n.d.-b). The factors were evaluated on a Likert scale, with 4 being the highest score and 1 being the lowest score for the category. For example, scoring 4 on the cost-effectiveness factor means the proposed alternative is the least costly to implement.

Based on a review of the literature on the proposed alternatives, examining case studies of local governments, stakeholder interviews, and my personal experience and knowledge working in the field, I have ranked the proposals in each of the categories. For cost-effectiveness,

increasing education on legal requirements is the least costly of all the options. Unlike the one-time commitment of implementing objective design standards, designating which projects are eligible for ministerial approval, and the ongoing staff costs of pre-application meetings, education on legal requirements requires little staff time to implement.

In terms of producing more units, however, the expansion of projects eligible for ministerial approval was the clear winner. The proposal can be modified to incorporate a small set-aside requirement for affordable housing units to benefit from the ministerial approval process, thus building affordable units. In this same category, increasing the use of objective design standards can streamline the approval process, reducing the "soft cost" budget and making projects more financially feasible. In turn, though not a guarantee, this added budget flexibility could allow for projects to include more affordable units. Using the pre-application meetings could yield similar benefits, though these meetings, as noted in the stakeholder interviews, are not always conducted with concrete projects in mind. For this reason, I ranked it below the objective design standard proposal. Last, increasing education around legal requirements does not have a direct correlation to more affordable units, which is why I ranked it the lowest in this category.

Looking at administrability, however, the education around legal requirements alternative ranks the highest. Most jurisdictions currently implement this proposal and little change would be required for full implementation. Next, I've chosen the ministerial approval as the next easiest to implement. From my perspective, implementing and administering this proposal is easier than the objective design standard proposal, which might require more staff review. Last, the pre-application meetings would require significant and constant staff resources to implement, which ranks this proposal last.

For the political acceptability factor, which I weighed the most important, the highest-ranking proposal is the increased education around legal requirements. Due to similar factors listed in the previous paragraph, I don't anticipate the implementation of this proposal to require much persuasion given the varying levels of existing implementation. Next, the use of pre-application meetings would not commit the local government to a streamlined approval or other ancillary benefits, thus making this factor the second highest ranking. Third, the use of objective design standards allows the local government to retain a small level of control at the standard-creation stage but would remove any discretion or opportunities for comment on projects once implemented, resulting in this ranking. Last, the expansion of projects eligible for ministerial approval, as noted by the local government advocate stakeholder, would strip the local government of any discretion in the housing approval process. Local governments, largely, want to retain control in the era of housing streamlining, and would not be so keen on voluntarily abandoning this discretion. This results in this proposal ranking last in this category.

Increasing education around legal requirements is the highest-scoring proposal, however, it is not without its flaws. For example, while it scored the highest overall, it did score poorly in producing more affordable units. Therefore, while the proposal is easy to implement, it should be coupled with another proposal to round out all considerations and provide the most benefit. For instance, the proposals to implement the use of objective design standards and expand projects eligible for ministerial approval could be good partners to the highest-scoring alternative. As a tie-breaker between these two, I chose the one with the higher political acceptability since that was the highest-weighted factor. Therefore, the suggested proposals I have for local government planners to implement would be to increase education around legal requirements and to implement the use of objective design standards.

Figure 5

Proposed Alternative	Cost Effectiveness (.1)	Equity in Producing More Affordable Units (.3)	Administrability (.2)	Political Acceptability (.4)	**Total**
Implement Use of Objective Design Standards	3 x .1 = .3	3 x .3 = .9	2 x .2 = .4	2 x .4 = .8	2.4
Implementing Pre-Application Meetings	1 x .1 = .1	2 x .3 = .6	1 x .2 = .2	3 x .4 = 1.2	2.1
Increasing Education Around Legal Requirements	4 x .1 = .4	1 x .3 = .3	4 x .2 = .8	4 x .4 = 1.6	3.1
Expanding Projects Eligible for Ministerial Approval	2 x .1 = .2	4 x .3 = 1.2	3 x .2 = .6	1 x .4 = .4	2.4
Scoring Matrix: 4=highest, 3, 2, 1=lowest					

References

Anson, M. G. (2020, October 29). *Schools and roads driven to top in survey*. California Forward. https://cafwd.org/news/schools-and-roads-driven-to-top-in-survey/

Biesiada, N. (2024, January 11). *Huntington Beach Reignites Fight Against State Housing Law*. Voice of OC. https://voiceofoc.org/2024/01/huntington-beach-reignites-fight-against-state-housing-law/

Bonner, D. (2023, August 8). *Desire for action on housing contrasts with how Californians want to live*. Public Policy Institute of California. https://www.ppic.org/blog/desire-for-action-on-housing-contrasts-with-how-californians-want-to-live/

California Legislative Information. (n.d.). Bill Search. https://leginfo.legislature.ca.gov/faces/billSearchClient.xhtml?session_year=20232024&keyword=objective+design+standards&house=Both&author=All&lawCode=All

City of Mission Viejo City Council Meeting. (2023). *City of Mission Viejo July 11, 2023 City Council Meeting*. Retrieved from https://dms.cityofmissionviejo.org/OnBaseAgendaOnline/Meetings/ViewMeeting?id=8316&doctype=1.

City of Poway. (n.d.). *City of Poway Planning Application*. City of Poway - Planning Permit Packets, Applications & Guidelines. https://poway.org/350/Planning-Permit-Packets-Applications-Gui

City of Sacramento. (2020, September). *Infill housing design standards - city of Sacramento*. Infill Housing Design Standards. https://www.cityofsacramento.org/-/media/Corporate/Files/CDD/Planning/Long-Range/Infill/Citywide-Infill-Housing-Design-Standards-092020.pdf?la=en

Dougherty, C. (2020). *Golden Gates: Fighting for housing in America*. Penguin Press.

Einstein, K. L., Glick, D. M., & Palmer, M. (2020). *Neighborhood Defenders Participatory Politics and America's housing crisis*. Cambridge University Press.

Elmendorf, C. S, Biber, E., Monkkonen, P., & O'Neill, M. (2020). "I Would, If Only I Could" How Cities Can Use California's Housing Element to Overcome Neighborhood Resistance to New Housing. *UCLA: The Ralph and Goldy Lewis Center for Regional Policy Studies*. Retrieved from https://escholarship.org/uc/item/45g8b2pv

Governor's Office of Planning and Research. (n.d.). *General plan information*. General Plan Information - Office of Planning and Research. https://opr.ca.gov/planning/general-plan/

Habitat for Humanity. (n.d.). *Streamlining approvals for affordable housing in California*. https://www.habitat.org/sites/default/files/documents/COH_Case_Study_California.pdf

Hanson Bridgett. (2021, September 16). *Housing law shows its teeth: Another win for objective standards*. https://www.hansonbridgett.com/Publications/articles/2021-09-16-housing-authority

HCD. (2021, October 19). *HCD strengthens efforts to increase housing accountability*. California Department of Housing and Community Development. https://www.hcd.ca.gov/about-hcd/newsroom/hcd-strengthens-efforts-to-increase-housing-accountability

HCD. (2022). (tech.). *Accessory Dwelling Unit Handbook*. Sacramento, CA: HCD.

HCD. (2023). (tech.). *San Francisco Housing Policy and Practice Review*. Sacramento, CA: HCD.

HCD. (2024). *Housing elements*. California Department of Housing and Community Development. https://www.hcd.ca.gov/planning-and-community-development/housing-elements

HCD. (2024). *Planning Grants and Local Housing Strategies Map*. cahcd.maps.arcgis.com. https://cahcd.maps.arcgis.com/apps/MapSeries/index.html?appid=c0b0f1f398774e9c805ef0ebcf4ebd45

HCD. (n.d.-a). *Annual progress reports - data dashboard and downloads*. Annual Progress Reports - Data Dashboard and Downloads | California Department of Housing and Community Development. https://www.hcd.ca.gov/planning-and-community-development/housing-open-data-tools/housing-element-implementation-and-apr-dashboard

HCD. (n.d.-b). *Technical assistance: Accelerating housing production*. California Department of Housing and Community Development. https://www.hcd.ca.gov/planning-and-community-development/technical-assistance

Hernandez, J. (2018). California Environmental Quality Act Lawsuits and California's Housing Crisis. *Hasting Environmental Law Journal*, *24*(1).

Hernandez, J. (2022). Anti-Housing CEQA Lawsuits Filed in 2020 Challenge Nearly 50% of California's Annual Housing Production. *California Center for Jobs and The Economy*.

Institute for Local Government. (2020, September 2). *Planning Costs Guidebook*. https://hcdarcgisdata.blob.core.windows.net/arcgis/Planning%20Cost%20Guide%20Final%2009-02-2020.pdf.

Lewis, P. G., & Neiman, M. (2002). *Cities under pressure: Local Growth Controls and residential development policy*. Public Policy Institute of California.

Malisos, J. (2023, March). *Objective Design Standards "The What and The How." League of California Cities Planning Commissioners Academy*.

Manji, S., & Finnigan, R. (2023). (rep.). *Streamlining Multifamily Housing Production in California: Progress Implementing SB 35*. Berkeley, CA: Terner Center.

Monkkonen, P., & Manville, M. (2020). Opposition to development or opposition to developers? Experimental evidence on attitudes toward new housing. *UCLA: The Ralph and Goldy Lewis Center for Regional Policy Studies*. Retrieved from https://escholarship.org/uc/item/23f7q6b9

Newsom, G. (2017, October 23). *The California Dream Starts at home*. Medium. https://medium.com/@GavinNewsom/the-california-dream-starts-at-home-9dbb38c51cae

OAG. (2021, November 3). *Attorney general Bonta launches housing strike force, announces convening of tenant roundtables across the State*. State of California - Department of Justice - Office of the Attorney General. https://oag.ca.gov/news/press-releases/attorney-general-bonta-launches-housing-strike-force-announces-convening-tenant

Office of Governor Gavin Newsom. (2023, October 12). *Governor Newsom signs package to streamline housing and expand tenant protections in California*. Governor Newsom Signs Package to Streamline Housing and Expand Tenant Protections in California. https://www.gov.ca.gov/2023/10/11/governor-newsom-signs-package-to-streamline-housing-and-expand-tenant-protections-in-california/

OPR. (2021). CEQA 101 - Office of Planning and Research. https://opr.ca.gov/ceqa/docs/20210809-CEQA_101.pdf

O'Neill, M., Gualco-Nelson, G., & Biber, E. (2018). Getting it Right: Examining the Local Land Use Entitlement Process in California to Inform Policy and Process. *UC Berkeley: Berkeley Law*.

Political Controversy and Growth Management. (n.d.). essay.

Raetz, H., Forscher, T., Kneebone, E., & Reid, C. (2020, March). *The hard costs of construction: Recent trends in labor ...* Terner Center for Housing Innovation. https://ternercenter.berkeley.edu/wp-content/uploads/pdfs/Hard_Construction_Costs_March_2020.pdf

SANDAG. (2020, July 10). 6th Cycle Regional Housing Needs Assessment Plan. https://www.sandag.org/-/media/SANDAG/Documents/PDF/projects-and-programs/regional-initiatives/housing-land-use/6th-cycle-regional-housing-needs-assessment-plan-2020-07-10.pdf

SGF. (n.d.). *State land use laws*. State Land Use Laws | Senate Governance and Finance Committee. https://sgf.senate.ca.gov/statelanduselaws

Steuteville, R. (2022, June 1). *California zoning reform: Are form-based codes the answer?*. CNU. https://www.cnu.org/publicsquare/2021/09/22/california-zoning-reform-are-form-based-codes-answer

Tobias, M. (2022, October 31). *Newsom campaigned on building 3.5 million homes. he hasn't gotten even close*. CalMatters. https://calmatters.org/housing/2022/10/newsom-california-housing-crisis/

Watanabe, T. (2023, February 25). *Court ruling halts UC Berkeley from building student housing at People's Park*. Los Angeles Times. https://www.latimes.com/california/story/2023-02-24/court-ruling-halts-uc-berkeley-from-building-student-housing-at-peoples-park

YIMBY Law. (2022, November 21). *469 Stevenson San Francisco*. https://www.yimbylaw.org/469-stevenson