

June 8, 2026



Board of Supervisors
County of San Diego
1600 Pacific Highway
San Diego, CA 92101

Re: Vehicle Miles Traveled Mitigation Updates and Related CEQA Exemption (Item 9)

Dear Honorable Board of Supervisors:

On behalf of the Building Industry Association of San Diego ("BIA"), I respectfully submit the following comments regarding the proposed changes to the County's vehicle miles traveled (VMT) mitigation program. The BIA represents the 25,000 local professionals who plan, design, build, and deliver housing throughout our region. Our members are committed to creating homes, supporting economic opportunity, and helping meet our region's housing needs. We offer these comments based on our members' direct experience navigating the policies, regulations, and costs that affect housing.

As you know, the BIA has long held concerns about the County's adoption of its VMT program and believes that it has had significant and obvious negative impacts on housing production in unincorporated San Diego. While we are appreciative of the ongoing efforts of staff to identify practical paths for development in this policy and litigation-restrained environment, we do not believe that the options outlined will create the housing that is so desperately needed.

With that in mind, we are optimistic that the 15183 streamlining opportunities will create a modest amount of comfort for homebuilders with potential projects in the unincorporated area. As outlined in the board letter, even with that tentative comfort, "there is a need to consider such a program as part of longer-term planning efforts as laws around VMT potentially evolve and as a land use planning tool." In other words, while 15183 gives us some hope, the reality of our ever-changing regulatory landscape requires additional, more concrete guidance.

More specifically, we are supportive of a mitigation program that is expansive enough to create real housing capacity and urge you to consider expanding the areas in which potential projects may be able to access mitigation. Further, the BIA urges you to continue the momentum from the November 2025 Housing Workshop where a number of very specific policy changes were discussed. Among those, as you'll recall, were items like updating the Zoning Ordinance and applying the Removing Barriers to Housing to all Village areas. These are priorities that, when

enacted, will have truly positive impacts on housing production that reflects the County's General Plan goals and principles.

For further discussion on this matter please contact Stefanie Benvenuto at 714.336.6536.

Sincerely,

A handwritten signature in black ink that reads "Aimee Faucett". The signature is written in a cursive, flowing style.

Aimee Faucett
President & CEO
Building Industry Association of San Diego