



July 23, 2026

Melinda Coy, Housing Accountability Unit Chief
Division of Housing Policy Development
California Department of Housing & Community Development
651 Bannon Street, Ste 400
Sacramento, CA 95833

AFFILIATES

*California Building
Industry Association*

*National Association
of Home Builders*

BUILDING INDUSTRY ASSOCIATION OF SAN DIEGO COUNTY

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P: (858) 450-1221 |
www.biasandiego.org

Via email: melinda.coy@hcd.ca.gov

RE: Request for Additional HCD Oversight of County of San Diego Housing Element

Dear Ms. Coy:

The Building Industry Association of San Diego County (BIASD) represents over 25,000 local professionals who plan, design, build, and deliver housing throughout the San Diego region. Our members are committed to creating homes, supporting economic opportunities, and helping meet the region's housing needs. In this sense, we are aligned with the California Department of Housing and Community Development (HCD) in your quest to support more housing. We submit this letter based on our members' direct experience navigating the policies, regulations, and costs that affect housing production in the County of San Diego (County).

On behalf of the BIASD, we request HCD formally review the County's failure to implement its legal obligations under the Sixth Cycle Housing Element Update, particularly the Implementation Program.

In 2021, HCD determined that the County's Housing Element Update was in substantial compliance with Housing Element law (Gov. Code, § 65580 et seq), in part based on the County's commitment to timely implement the Implementation Program actions. However, there has been a staggering amount of County inaction on its Housing Element as demonstrated below, and only 3 years remain in the current planning period. As such, the County is not in compliance with Housing Element Law.

In sum: the County has missed stated deadlines, and in some cases is behind by years, and, more importantly, the County has acknowledged it is not in full compliance with Housing Element Law. Despite such an acknowledgement, the County continues to tout its success on housing. That position is severely undermined by the facts, which instead demonstrate that:

- The County's housing production is meager, and in the third year of decline;
- Total permitted units have declined 38%, and nearly half of all recent housing produced has been Accessory Dwelling Units (ADUs);
- Projects approved during an earlier era largely drive any current progress meeting its Regional Housing Needs Allocation (RHNA) goals; and
- The County is currently adopting housing policies that will harm the ability to build new homes.
-

BIASD therefore would appreciate additional HCD review of the County's Housing Element and strongly believe HCD oversight is necessary to ensure the County complies with applicable Housing Element Law.



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A. Background on County's Housing Element Inaction

HCD wrote the County (Attachment A, HCD Letter of Inquiry to County, January 28, 2026) requesting updates on several Implementation Program actions which HCD noted were incomplete and behind schedule. With only 3 years left in the 6th Cycle planning period, the County has missed its deadline for at least 8 of its most significant Housing Element program actions:

1. Zoning Ordinance Amendments to Achieve Maximum Density
(Program 3.1.1.C)

Due Date: Early 2023
Delayed: 3.5 years

2. Expand Eligibility of Checklist Exemptions (Program 3.1.1.K)

Due Date: November 1, 2023
Delayed: 2 years, 8 months

3. Zoning Ordinance Cleanups (Program 3.1.3.A)

Due Date: End of 2022
Delayed: Over 3.5 years

4. Group Homes for Seven or More (Program 3.3.2.A)

Due Date: December 1, 2022
Delayed: 3 years, 7 months

5. Removal of Constraints to Multi-Family Housing in Areas of Opportunity
(Program 3.6.5.A)

Due Date: January 1, 2025
Delayed: 1.5 years

6. Negative Environmental, Neighborhood, Housing and Health Impacts Strategy (Program 3.6.6.C)

Due Date: January 1, 2025
Delayed: 1.5 years

7. Place-Based Strategies in Low-Resource Communities and Environmental Justice Communities (Program 3.6.6.G)

Due Date: December 1, 2022
Delayed: 3 years, 7 months

8. Twin Oaks Community Plan Update (Program 3.6.6.F)

Due Date: Begin in 2025
Delayed: 1-1.5 years



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Remarkably, we believe that the County did not even begin work on some of the Implementation Program actions until after the due date passed. This includes the Place-Based Strategies in Low Resource Communities and Environmental Justice Communities and Negative Environmental, Neighborhood, Housing, Health Impacts Strategy program actions.

This complete inaction on important environmental justice initiatives is misaligned with the County's equity goals and obligations to affirmatively-further fair housing. Had the County completed the program actions on the timelines provided to HCD, the programs would undoubtedly have had a positive impact on housing production.

A. County Appears to Misunderstand its Housing Element Obligations

The County's inaction may be based on a "mission accomplished" mindset that it need not complete its program actions on time because it has already met its RHNA allocations for 3 of the 4 income categories. In fact, after describing a list of delayed program actions, the County nevertheless informed HCD that it "goes beyond the Housing Element requirements" and "[t]he County's efforts are illustrated by meeting or exceeding our RHNA allocations in three of the four income categories..." (County letter to HCD, February 7, 2026, a copy of which is included here as Attachment B.)

Under Housing Element Law, however, a Housing Element must contain:

"[a] program that sets forth a schedule of actions during the planning period, each with a timeline for implementation, that may recognize that certain programs are ongoing, such that there will be beneficial impacts of the programs within the planning period..." (Gov. Code Sec. 65883(c).)

The County's view that it may defer program actions until the end of the planning period conflicts with its Housing Element obligations. If a program is completed only at the very end of the housing cycle, it provides no positive impact on housing production during the planning period.

In fact, the County's inaction appears to stem from a misunderstanding or disregard of Housing Element Law. Towards that end, the County has taken the position that it will be compliant if it completes its program actions by the end of the housing cycle. The County stated that the final required program actions would be:

"completed by 2029, ensuring the County will be in full compliance with our Housing Element obligations by the end of this housing cycle." (Attachment B.)

The County's interpretation of its Housing Element obligations represents a fundamental misunderstanding of the law. First, full compliance with Housing Element Law is required throughout the planning period. Compliance is not assessed only at the end of the housing cycle. And, in fact, the County's statement that it "will be" in "full" compliance "by the end of the housing cycle" is an acknowledgement that the County is not in full compliance now.



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In addition, completing program actions by the very end of the housing cycle does not establish compliance. Rather, the delay raises serious compliance concerns because the programs' benefits are not realized during the housing cycle. If the County's interpretation of Housing Element Law were correct, all program action deadlines would be due in 2029, a conclusion that would defeat the Legislature's clear intent to mandate earlier action.

B. Housing Production is Low and Trending Downward

The County's RHNA progress rests largely on projects approved during an earlier, more pro-housing era and an over-reliance on ADUs. That progress is unlikely to continue unless the County adopts meaningful pro-housing policies now. Delaying Housing Element program actions jeopardizes future housing production.

In fact, the County's latest General Plan Annual Progress Report (Report) data shows a troubling decline in both the trajectory and composition of recent housing production. For instance, the Report uncovers several alarming trends:

- The County has permitted only **28% of its housing allocation for Very Low Income** households and is not on track to meet its target.
- 2025 marked the **3rd year of steady decline** in permitted housing units, decreasing from 1,511 units in 2022 to 932 units in 2025.
- **Total permitted units have declined 38%** in 2025 (932) compared to 2022 (1,511), which was the high point of permitted units during this RHNA cycle.
- Over the past 2 years, **ADUs represented 44% of total housing units** permitted in the County. Of the 1,088 units permitted in 2024, 45% (489) were ADUs. Of the 932 permitted units in 2025, 43% (403) were ADUs.
- Permits for **ADUs decreased by 17.5% in 2025 (403)** compared to 2024 (489).
- The County permitted **529 housing units in 2025, excluding ADUs.**
-

ADUs are an important housing option and should continue to be encouraged. However, relying too heavily on ADUs to meet RHNA goals is not a sustainable strategy for addressing family housing needs.

The County's current level of approximately 500 non-ADU housing permits per year is almost negligible for a jurisdiction with more privately-owned land than the entire state of Rhode Island. The future outlook is even worse. According to recent County data:

- **Only 28 discretionary housing projects** of 5+ units submitted applications over the past 3-year period (2023-2025), excluding one specific plan amendment which does not propose increased units.
- These 28 projects total just **1,535 units over a 3-year permitting pipeline.** (County Inclusionary Housing Ordinance Attachment O Supporting Materials, June 24, 2026.)



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Future permitted units are difficult to forecast in any jurisdiction, let alone in the County. Because the 28 projects referenced above are discretionary and the County has a documented track record of stalling or denying housing projects, it cannot – and should not – be assumed that the County will permit any of these 1,535 pipeline units. Based on current trends, however, future County housing permits are likely to fall below the current pace of approximately 500 units per year. Had the stalled program actions been completed on-time, they would have had a meaningful impact on housing production, including production of Very Low Income units.

Rather, the current diminished state of housing production in the County is the direct result of prior County policies undermining housing production, particularly the implementation of its Vehicle Miles Traveled (VMT) guidelines. Action from the County is needed now to reverse the downward trend and to increase its production of non-ADU housing units. Without timely completion of the Housing Element program actions, the County will be out of compliance with Housing Element Law and not able to meet its current or future housing goals.

C. County is Prioritizing Actions of Little or Negative Benefit to Housing

After years of inaction, the County appears to now be rushing to complete its Housing Element program actions in a haphazard manner, with negative consequences to housing production. When the County has recently acted, it has done so in ways that undermine project feasibility or take only minimal steps in a transparent effort to claim completion. Such actions should not be rewarded.

1. “Housing Unlocked” Zoning Ordinance Amendments

As one example, the highly-anticipated and long-delayed first phase of the County's Housing Unlocked Zoning Ordinance Amendments includes only a handful of trivial changes including:

- a. Removes the limit on number of stories, while keeping all height limits exactly the same.
- b. Removes the interior side yard setback between housing units, while leaving all other setbacks exactly the same.
- c. Allows duplex and triplex building types in zones where the level of density was already allowed.
- d. Removes two minimum lot sizes while maintaining existing discretionary process requirements to achieve planned General Plan density per lot.
- e. Allows Tiny Homes on Wheels as a primary and accessory use.



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Housing Unlocked Phase 1 proposes a new requirement for projects to achieve at least 70% of the General Plan density for RHNA sites. While well-intentioned, this proposal is not accompanied by any economic analysis to assess impacts on project feasibility, even though a previous evaluation prepared for the Development Feasibility Analysis (DFA) determined that high-density development was economically infeasible.

The project feasibility analysis raises serious questions. If some RHNA sites are feasible at 50% of the General Plan density but not above 70%, then the new 70% minimum may instead reduce housing production in the County. On the whole, when weighing the trivial zoning changes of Housing Unlocked against its potentially counterproductive density minimum, Housing Unlocked is a status quo policy initiative aimed at checking a box and potentially “buying time” until the next housing cycle.

2. Inclusionary Housing Ordinance

The County’s recently-adopted Inclusionary Housing Ordinance is another well-intentioned initiative that has strong likelihood to decrease housing production. Unlike Housing Unlocked, however, the County prepared an economic analysis and then engaged two consultants to peer-review it. The overall conclusion is that the initiative may decrease market-rate housing, and minimally increase affordable housing.

In its report to the Board of Supervisors, staff summarized the economic findings and stated that higher affordable requirements “may increase development costs and serve to disincentivize some market-rate housing projects from advancing.” (County Inclusionary Housing Ordinance Board Letter, p. 9, June 24, 2026.)

After specifically recognizing the potential to decrease market-rate housing, County staff nonetheless stated that: “adoption of the Inclusionary Housing Ordinance is estimated to produce 15 to 60 deed-restricted affordable units per year.” (County Inclusionary Housing Ordinance Board Letter, p. 1, June 24, 2026.) Despite the evidence establishing potential harmful impacts on housing production, the County Board of Supervisors adopted the Inclusionary Housing Ordinance.

If the County continues to adopt initiatives that it acknowledges may decrease market-rate housing supply, it ultimately will harm affordable housing production as well. In contrast, completion of the Housing Element Implementation Program actions on-time would have been a better strategy to increase **both** market-rate and affordable housing in the County.



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D. Request for Additional HCD Review

The County has made such little progress on key Housing Element program actions that it risks being out of compliance with Housing Element Law. Under Government Code section 65585, HCD is required to review a local agency's failure to implement its Housing Element implementation program actions:

"The department **shall review** any action or failure to act by the city, county, or city and county that it determines is inconsistent with an adopted housing element or Section 65583, including **any failure to implement any program actions included in the housing element** pursuant to Section 65583." Gov. Code Sec. 65585(l)(1)(A)

"The department **shall review** any action or failure to act by the city, county, or city and county that it determines is inconsistent with an adopted housing element or Section 65583, including **any failure to implement any program actions included in the housing element** pursuant to Section 65583." Gov. Code Sec. 65585(l)(1)(A)

The County's failure to timely complete its program actions is inconsistent with Government Code section 65583(c), which requires a schedule that delivers the beneficial impacts of the implementation programs during the planning period. The inconsistency needs to be addressed.

HCD's 2021 finding that the County's Housing Element was in substantial compliance with Housing Element Law was based in part on the County's commitment to complete the implementation Program actions. The County has failed to honor that commitment. We therefore request that HCD review its previous finding of substantial compliance and directly intervene to ensure the County completes its program actions in a timely and meaningful fashion.

Sincerely,

A handwritten signature in blue ink, reading 'Aimee Faucett', is positioned above the printed name and title.

Aimee Faucett
President & CEO
Building Industry Association of San Diego

Attachments A: HCD letter to County of San Diego- July 28, 2026

Attachment B: County response letter to HCD- February 27, 2026

ATTACHMENT A

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT**

651 Bannan Street, Ste. 400
Sacramento, CA 95811
(916) 263-2911 / FAX (916) 263-7453
www.hcd.ca.gov



January 28, 2026

Ebony N. Shelton, Chief Administrative Officer
County of San Diego
1600 Pacific Highway, Room 209
San Diego, CA 92101

**RE: County of San Diego's 6th Cycle Housing Element Program Requirements –
Letter of Inquiry**

Dear Ebony N. Shelton:

The purpose of this letter is to inquire about the status of the County of San Diego's (County) implementation of 6th Cycle Housing Element Programs pursuant to Government Code section 65585, subdivision (i). The California Department of Housing and Community Development (HCD) sent the County a letter on November 2, 2021 finding the County's housing element in substantial compliance with Housing Element Law.¹ This was based on, among other reasons, the County's commitment to implement Programs according to specific timelines.

As the commitment date has passed for the programs listed below, HCD requests that the County provide an update on the status and accompanying documentation (e.g., ordinances, resolutions, zoning codes, etc.) as appropriate, or timeline for completion for the following:

- Program 3.1.1.C (Zoning Ordinance Amendments to Achieve Maximum Density) was due by June 1, 2023. While the County has indicated this is ongoing as part of the Housing Unlocked effort, the County should provide a clear timeline for when the program will be completed.
- Program 3.1.1.E (Low to Moderate Inclusionary Ordinance) was due by November 1, 2023. While the County has indicated this program is ongoing, the County should provide a clear overview of remaining actions and a timeline for when the program will be completed.
- Program 3.1.1.H (Housing Yields in Mixed-Use Zones) was due by December 1, 2023. The County has provided some information on efforts to implement Assembly Bill 2011 and Senate Bill 6. The County should confirm what actions have been taken and clarify how they expand beyond state law.

¹ Gov. Code, § 65580 et seq.

- Program 3.1.1.K (Expand Eligibility of Checklist Exemptions) was due November 1, 2023. While the County has indicated this is ongoing as part of the Housing Unlocked effort, the County should provide a clear timeline for when the program will be completed.
- Program 3.1.3.A (Zoning Ordinance Cleanups) was due by January 1, 2023. While the County has indicated this is ongoing as part of the Housing Unlocked effort, the County should provide a clear timeline for when the program will be completed.
- Program 3.1.4.A (Zoning Ordinance Amendments for ADUs) was due by December 1, 2022. The County has provided an updated zoning ordinance regarding ADUs from 2023. While the County took actions to address this program, it should provide updated actions to address the latest changes to state law and provide a clear timeline for implementation.
- Program 3.2.1.A (Density Bonus Ordinance Update) was due by November 1, 2023. The County has provided an updated zoning ordinance regarding State Density Bonus Law from 2023. While the County took actions to address this program, it should provide updated actions to address the latest changes to state law and provide a clear timeline for implementation.
- Program 3.3.2.A (Group Homes for Seven or More) was due by December 1, 2022. While the County has indicated this is ongoing as part of the Housing Unlocked effort, the County should provide a clear timeline for when the program will be completed.
- Program 3.6.5.A (Removal of Constraints to Multi-Family Housing in Areas of Opportunity) was due by January 1, 2025. While the county has indicated this effort is ongoing, it should provide an overview of completed actions and a clear timeline for when the program will be completed.
- Program 3.6.5.B (Enhanced Housing Choices and Affordability in Areas of Opportunity, including Rancho Santa Fe) was due by November 1, 2023. While the County has indicated this effort is ongoing, it should provide an overview of completed actions and provide an outline of remaining steps and clear timeline for when the program will be completed.
- Program 3.6.6.B (Conserved and Improved Assets in Areas of Lower Opportunity and Concentrated Poverty) was due by January 1, 2025. While the County has indicated this effort is ongoing, it should provide an overview of completed actions and provide an outline of remaining steps and clear timeline for when the program will be completed.
- Program 3.6.6.C (Negative Environmental, Neighborhood, Housing, Health Impacts, Strategy) was due by January 1, 2025. The County has indicated implementation of this program has not begun. The County should provide an outline of remaining steps and clear timeline for when the program will be completed.

- Program 3.6.6.F (Twin Oaks Community Plan Update) was due to begin implementation in 2025. The County should provide an overview of completed actions and provide an outline of remaining steps and clear timeline for when the program will be completed.
- Program 3.6.6.G (Placed-Based Strategies in Low Resource Communities and Environmental Justice Communities) was due by December 1, 2022. The County has indicated this program has not yet been initiated. The County should provide an outline of remaining steps and clear timeline for when the program will be completed.

Consequences of Failure to Implement Programs

Government Code section 65585, subdivision (i), grants HCD authority to review any action or failure to act by a local government that it determines is inconsistent with an adopted housing element or Housing Element Law. This includes failure to implement program actions included in the housing element. Failure to implement program actions described above by the statutory deadline may result in HCD revoking its finding of substantial compliance with Housing Element Law.

Various consequences may apply if the County does not have a housing element in compliance with Housing Element Law, including ineligibility or delay in receiving certain state funds, referral to the California Office of the Attorney General, court-imposed financial penalties, the loss of local land use authority to a court-appointed agent, and the application of the “builder’s remedy.”²

Conclusion

Housing elements are essential to developing a blueprint for growth and are a vital tool to address California’s prolonged housing crisis. Accordingly, state law has established clear disincentives for local jurisdictions that fail to comply with Housing Element Law. To ensure the County continues to meet the 6th cycle update requirements for a substantially compliant housing element, the County must submit any adopted ordinances, resolutions or documentation that demonstrates that housing element program commitments have been met to HCD for review.³

HCD understands that the County has many commitments and recognizes the challenges of implementation. HCD will consider any written response before taking further action authorized by Government Code section 65585, subdivision (i), including issuance of a Corrective Action Letter and removal of HCD’s finding of housing element compliance.

² Gov. Code, §§ 65585, subds. (j), (l)(1), (i); 65589.5, subd. (d)(6)(h)(11).

³ Gov. Code, § 65585.

Ebony N. Shelton, Chief Administrative Officer
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Please provide a written response to this inquiry by February 28, 2026. If you have any questions or would like to discuss the content of this letter, please contact Sayed Murad at Sayed.Murad@hcd.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Melinda Coy", followed by a long horizontal flourish.

Melinda Coy
Housing Accountability Unit Chief

ATTACHMENT B



DAHVIA LYNCH
DEPUTY CHIEF ADMINISTRATIVE OFFICER
LAND USE AND ENVIRONMENT GROUP OFFICE
1600 PACIFIC HIGHWAY, ROOM 212 SAN DIEGO, CALIFORNIA 92101-2422
858-514-4990

February 27, 2026

Sayed Murad, Housing Policy Specialist, Housing Policy Division
California Department of Housing & Community Development
651 Bannan Street
Sacramento, CA 95833

RESPONSE TO LETTER DATED JANUARY 28, 2026 – RE: COUNTY OF SAN DIEGO'S 6TH CYCLE HOUSING ELEMENT PROGRAM REQUIREMENTS – LETTER OF INQUIRY

Dear Sayed Murad,

Thank you for sending the Department of Housing & Community Development's (HCD) Letter of Inquiry dated January 28, 2026, regarding the County of San Diego's (County) implementation of 6th Cycle Housing Element Programs and for highlighting the programs for which the target timeline has passed. The County appreciates the opportunity to engage with HCD on these items and values the ongoing collaboration to ensure that Housing Element implementation aligns with State requirements and shared housing goals. Of the fourteen Housing Element implementation programs highlighted in the Letter of Inquiry, five are completed and nine are in progress; six of the nine in progress will be completed by the end of 2026, with the remaining programs scheduled for completion by the end of 2027 or 2029, consistent with their scope and complexity (Table 1). While the timing for each action may have been shifted to accommodate additional housing actions the County has completed above and beyond those in the Housing Element, we will be in full compliance with completing all our Housing Element implementation items within this housing cycle, as required by State Housing Element Law.

County Addresses Housing Needs: Above and Beyond the Housing Element

As a Prohousing Designated Jurisdiction, the San Diego County Board of Supervisors (Board) and County staff continue to demonstrate a sustained commitment to addressing housing needs across the unincorporated county. In recent years, the Board has advanced a broad suite of housing-focused initiatives in addition to formal Housing Element implementation, reflecting a long-term and multi-pronged approach to increasing housing supply, improving affordability, and reducing operational barriers to development. These actions include:

- Strategic housing, homelessness, and land use frameworks;
- Development of housing feasibility and market analyses;
- Regulatory and process streamlining initiatives;
- Direct investment in affordable housing;
- Repurposing excess public land for affordable housing (11 sites); and
- Coordinated, enterprise-wide implementation efforts.

Response – RE: County of San Diego's 6th Cycle Housing Element Program Requirements – Letter of Inquiry
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The County's Housing Blueprint¹ serves as a strategic roadmap to address the root causes of the region's housing challenges, and the Homelessness Solutions and Prevention Action Plan² advances the County's broader Framework for Ending Homelessness³ through coordinated prevention, housing, and supportive service strategies. This work is occurring in parallel with preparation of the Sustainable Land Use Framework (Framework)⁴, a comprehensive policy initiative intended to balance community priorities, guide future land use and infrastructure decisions, and align housing growth with the Board's climate, mobility and equity goals for the unincorporated area. The County has also completed a Development Feasibility Analysis (DFA)⁵, which evaluated market conditions, development costs and regulatory factors to identify barriers to housing production and opportunities to support additional housing capacity within four unincorporated community planning areas.

County Invests in Housing Planning and Construction

To directly address procedural and regulatory constraints, in 2023, the Board adopted 22 actions as part of the Removing Barriers to Housing Initiative⁶ to accelerate housing production, supported by a \$15 million funding commitment, including measures to streamline review processes and reduce entitlement timelines. In parallel with policy and regulatory initiatives, the County provides direct financial support for affordable housing development by leveraging local, State, and federal funding sources to offer loans and other assistance to housing projects throughout the region. The County's overall affordable housing portfolio totals \$390 million and supports more than 9,500 units. When complete, these units are expected to house more than 20,000 individuals. Since 2017, the Board has invested \$112 million local dollars into the Innovative Housing Trust Fund. Of the previously mentioned 9,500 affordable housing units, more than 3,000 of those were made possible due to the creation of the Innovative Housing Trust Fund. Currently, the County's affordable housing pipeline includes 18 developments and 1,745 units across the region that are under construction or anticipated to begin construction in the coming years.

County Increases Community Engagement and Internal Collaboration

The Board also held multiple housing and land use workshops, including Let's Talk Housing Workshop in December 2022⁷ and most recently Housing Forward Workshop in November 2025⁸,

¹ Housing Blueprint Implementation Plan can be found here: <https://engage.sandiegocounty.gov/housing-blueprint>

² The Homelessness Solutions and Prevention Action Plan can be found here:

https://www.sandiegocounty.gov/content/dam/sdc/sdhcd/new-docs/OHS/County_of_San_Diego_Homeless_Solutions_and_Prevention_Action_Plan_February_2024.pdf

³ Information on the Framework for Ending Homelessness can be found here:

<https://www.sandiegocounty.gov/content/sdc/sdhcd/OHS/frameworkForEndingHomelessness.html>

⁴ Information on the Sustainable Land Use Framework can be found here:

<https://engage.sandiegocounty.gov/sustainableframework>

⁵ Information on the Development Feasibility Analysis can be found here:

<https://www.sandiegocounty.gov/content/sdc/pds/advance/development-feasibility-analysis--dfa-.html>

⁶ Information on Removing Barriers to Housing can be found here:

<https://sdccounty.legistar.com/LegislationDetail.aspx?ID=6210156&GUID=F9B9BD10-194D-46F5-B66E-A6CCEE3554CC&Options=&Search=>

⁷ Information on the December 13, 2022, Board of Supervisors hearing can be found here:

<https://file.sandiegocounty.gov/COB/COBPublicView?id=0901127e80f7d3d7>

⁸ Information on the November 19, 2025, Board of Supervisors hearing can be found here:

<https://sdccounty.legistar.com/LegislationDetail.aspx?ID=7733429&GUID=3BACC263-6CFC-47EC-ABE3-3911694D860F&Options=&Search=>

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to reinforce policy priorities, evaluate progress, and guide future action. To complement and implement all of these efforts, the County's Chief Administrative Officer (CAO) launched the Housing for All⁹ Framework, which provides an enterprise-wide approach to advancing housing priorities across the County. Implementation is supported by coordinated, cross-enterprise Housing Catalyst teams, bringing together staff from multiple departments to align policy development, regulatory updates, funding strategies, and implementation actions. This structure is intended to support execution of County Housing programs, including Housing Element actions, improve cross-departmental coordination, and ensure that housing initiatives are advanced in a timely, consistent, and integrated manner.

Together, these efforts have produced measurable outcomes. As will be documented in the County's 2025 General Plan Annual Progress Report, the County has met approximately 98 percent of its total Regional Housing Needs Allocation (RHNA) for the 6th Housing Element cycle, including meeting allocations for low-, moderate-, and above moderate-income housing. While production of Very Low-income housing in the unincorporated area remains challenging, with approximately 28 percent of the allocation met after five years of the eight-year cycle, the County continues to prioritize programs, incentives, and partnerships to improve feasibility and accelerate production in this category. For example, the County contributes funds and land for the production of Very Low-income and other affordable housing in the unincorporated communities and incorporated cities across the San Diego region. Additionally, through the Housing Authority of the County of San Diego, Project Based Vouchers are awarded to support the development of affordable housing for extremely and very low-income households further moving the needle in the Very Low-income category.

Housing Element Program Implementation

Housing Element programs involve complex regulatory changes, interrelated policy decisions, and technical zoning updates that are most effective when addressed comprehensively rather than through piecemeal amendments. This section provides a high-level overview of how the County is organizing and delivering Housing Element implementation.

Many jurisdictions, including the County, are facing a series of compounding fiscal constraints while working to progress housing initiatives, and foresee the current economic climate continuing to be a challenge. In response, County staff have strategically combined Housing Element programs with related Board-directed initiatives and advanced them as comprehensive implementation packages. This approach allows the County to make efficient use of resources while addressing multiple policy objectives through integrated work programs and phased implementation.

Advancing programs in this manner reduces duplication, improves internal coordination, and provides clearer and more predictable direction to applicants and the public. This approach also recognizes that many programs require phased implementation and robust community and stakeholder engagement. Larger zoning amendments and policy reforms often benefit from additional technical analysis, outreach, and iterative refinement to ensure long-term effectiveness and durability. As a result, certain programs are sequenced across multiple phases or aligned with periodic Zoning Ordinance updates, while still advancing Housing Element objectives within the adopted planning period.

⁹ Information on Housing for All can be found here: <https://www.sandiegocounty.gov/content/sdc/housing-hub.html>

Through this coordinated approach, the County is currently implementing multiple Housing Element Programs – including Programs 3.6.5.B, 3.6.6.B, 3.1.1.C, 3.1.1.K, 3.1.3.A, 3.3.2.A, and 3.6.5.A – through initiatives such as Housing Unlocked, Removing Barriers to Housing, the Development Feasibility Analysis, and the Grading Ordinance Amendment and Expanded By Right Program, supported by preparation of a Programmatic Environmental Impact Report (PEIR). These initiatives enable the County to address streamlining, zoning consistency, environmental review, and feasibility in a coordinated and efficient manner.

Program Summaries

The Program Summaries that follow provide program-specific details on completed and ongoing actions, including key outcomes, findings, and next steps. Additional information on each program is detailed in Table 1. Together, these sections are intended to demonstrate not only the status of individual Housing Element programs, but also the County's broader, coordinated strategy for delivering Housing Element implementation in an efficient, transparent, and sustainable manner.

The County has successfully completed the following programs:

Program 3.1.1.H – Housing Yields in Mixed-Use Zones

- Completed on October 9, 2024, through staff analysis documented in a Board memorandum¹⁰ (Table 1).
- County staff evaluated residential development capacity and housing yields within mixed-use zones as part of a comprehensive review of the Zoning Ordinance as well as recently adopted State law and ongoing implementation efforts. As documented in the Board memorandum, the analysis concluded that the County's existing and in-progress regulatory framework, including implementation of Senate Bill (SB) 6 and Assembly Bill (AB) 2011 mixed-use housing provisions, adoption and refinement of Objective Design Standards, development of the Grading Ordinance and Expanded By-Right Program, and the broader Housing Unlocked initiative, collectively satisfies the intent of this program.¹¹ These efforts establish clear, objective, and ministerial pathways for residential and mixed-use development, increase certainty for applicants, and support realizing the assumed residential capacity without the need for additional standalone zoning changes specific to this Housing Element program.
- In addition to completing the program analysis, the County's Housing Legislation team has taken proactive steps to support effective implementation of State housing laws and maximize their real-world impact. This includes maintaining the County's Housing Laws in Action webpage, which provides up-to-date summaries of new State housing legislation, applicability guidance, and implementation resources; hosting public webinars and trainings on recently enacted housing laws; and providing technical assistance to applicants, jurisdictions, and stakeholders through user-friendly tools such as interactive maps, explanatory guidance documents, and process summaries.¹²

Program 3.1.4.A – Zoning Ordinance Amendments for Accessory Dwelling Units (ADUs)

¹⁰ The Board hearing materials, including Board letter, and minute order are available here:
<https://www.sandiegocounty.gov/content/sdc/pds/advance/housingoptions.html>

¹¹ The Housing Yields in Mixed Use Zones Memo from the Board hearing in October 2024, can be found here:
<https://file.sandiegocounty.gov/COB/COBPublicView?FileId=30907957>

¹² Information on Housing Laws in Action, including checklists and maps, can be found here:
<https://www.sandiegocounty.gov/content/sdc/pds/longrangeplanning/housing-legislation.html>

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- Completed on July 19, 2023, through adoption of the 2023 Housing Zoning Ordinance Update, which amended the Zoning Ordinance to implement and align with State ADU law in effect through 2023¹³ (Table 1).
- In addition, the County issued a Director's Determination on January 29, 2025, clarifying that, in the event of any inconsistency between State law and the County Zoning Ordinance, State law prevails.¹⁴ This determination provides interim regulatory clarity and ensures continued compliance as State ADU statutes evolve.
- A subsequent amendment to the Zoning Ordinance is going forward for Board consideration for adoption in early 2026 to further clarify ordinance language, incorporate State ADU laws adopted since 2023, and allow for the separate sale of ADUs, consistent with AB 1033.¹⁵

Program 3.2.1.A – Density Bonus Ordinance Update

- Completed on July 19th, 2023, through adoption of the 2023 Housing Zoning Ordinance Update, which amended the Zoning Ordinance to implement and align with State Density Bonus Law as adopted through 2023¹⁶ (Table 1).
- In addition to the incentives and concessions required under State law, the County provides one additional incentive beyond what is mandated, further supporting development feasibility for projects that include affordable housing.
- To support effective implementation, the County has developed supplemental guidance materials, including frequently asked questions documents and process guidance, to help applicants understand Density Bonus provisions.¹⁷
- As part of the County's broader Removing Barriers to Housing initiative, the County has designated a Housing Liaison to work directly with applicants proposing Density Bonus projects. The Housing Liaison provides early coordination, process navigation support, and cross-Department assistance, helping applicants efficiently move through the permitting and affordable housing agreement process.
- State legislation related to housing, including Density Bonus, is reviewed on an ongoing basis to assess whether additional Zoning Ordinance amendments are necessary.¹⁸

Program 3.6.5.B – Enhanced Housing Choices and Affordability in Areas of Opportunity, including Rancho Santa Fe

- Completed as reported on November 19, 2025, Board memorandum, with ongoing implementation through related Board-directed actions¹⁹ (Table 1).
- The County has addressed the intent of this program by implementing incentive-based and streamlining measures that expand housing choices and improve feasibility in areas of opportunity. Key actions include the Removing Barriers to Housing action in May 2023,

¹³ Board hearing materials from the Housing Zoning Ordinance Update in 2023 are available here:

<https://www.sandiegocounty.gov/content/sdc/pds/longrangeplanning/housingzoupdate.html>

¹⁴ The Director's Determination on state law is available here:

https://www.sandiegocounty.gov/content/dam/sdc/pds/zoning/DirectorDetermination_ImplementingHousingLaws.pdf

¹⁵ The project webpage for the current ADU Zoning Ordinance update is located here:

<https://www.sandiegocounty.gov/content/sdc/pds/longrangeplanning/ADU-ZO.html>

¹⁶ Board hearing materials from the Housing Zoning Ordinance Update in 2023 are available here:

<https://www.sandiegocounty.gov/content/sdc/pds/longrangeplanning/housingzoupdate.html>

¹⁷ Information on Housing Laws in Action, including Density Bonus FAQs, can be found here:

<https://www.sandiegocounty.gov/content/sdc/pds/longrangeplanning/housing-legislation.html>

¹⁸ Additional information on the Zoning Ordinance, engagement and periodic updates are located here:

<https://www.sandiegocounty.gov/content/sdc/pds/zoning.html>

¹⁹ The Fall 2025 Board memorandum, Housing Initiatives Update including project specific links, can be found here:

<https://file.sandiegocounty.gov/COB/COBPublicView?FileId=41084567>

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which established guaranteed review times for workforce housing including missing middle housing such as duplex, triplex and multi-family housing.²⁰

- In addition, further streamlining and support for by-right (ministerial) processing for eligible housing projects in VMT-efficient and other areas, including areas of opportunity such as Rancho Santa Fe, will be completed by Summer 2027 through the Grading Ordinance and Expanded By-Right Program and associated PEIR, to which the Board has committed \$4.2 million in one-time only funding.²¹
- Progress and outcomes associated with these efforts were discussed with the Board as part of the Fall 2025 Housing Workshop, reaffirming the County's ongoing commitment to advancing housing opportunities in higher-opportunity areas consistent with Housing Element objectives.

Program 3.6.6.B – Conserved and Improved Assets in Areas of Lower Opportunity and Concentrated Poverty

- Completed as reported on November 19, 2025, through a Board memorandum and through a coordinated set of analytical, planning, and infrastructure-focused actions that directly target lower-opportunity communities²² (Table 1). As documented in the memorandum, key actions included:
 - The County completed a DFA that included focused analysis of communities such as Spring Valley, Lakeside, Buena Creek, and Casa de Oro, identifying infrastructure gaps, regulatory barriers, and market constraints that limit housing investment in lower-opportunity areas. The DFA provided prioritized recommendations to support housing production, reinvestment, and asset preservation in these communities. As part of the DFA, the County conducted infrastructure gap assessments to identify deficiencies in roadways, utilities, and community amenities and to establish prioritized investment strategies.²³
 - Through the Community Based Transportation Program (CBT), the County partnered with local communities to develop Neighborhood Mobility Plans for Buena Creek, Casa De Oro, Spring Valley, and Lakeside that prioritize infrastructure, transportation, and active mobility improvements. These plans serve as implementation tools to support access to housing, services, and employment, while improving neighborhood conditions and long-term community viability in areas of concentrated need.²⁴
- While this program has been completed through the actions reported to the Board, implementation continues through follow-on planning efforts, including the Buena Creek Specific Plan, which builds upon DFA and CBT findings to refine land use policies, zoning standards, and infrastructure strategies in the North County Metro subregion.²⁵

²⁰ The Removing Barriers to Housing Board Letter is available here:

<https://file.sandiegocounty.gov/COB/COBPublicView?FileId=28075492>

²¹ More information on the PEIR, Grading Ordinance Update and Expanded By-Right Housing Program can be found here: <https://www.sandiegocounty.gov/content/sdc/pds/ceqa/POD-21-005.html>

²² The Fall 2025 Board memorandum, Housing Initiatives Update including project specific links, can be found here: <https://file.sandiegocounty.gov/COB/COBPublicView?FileId=41084567>

²³ Information on the Development Feasibility Analysis can be found here:

<https://www.sandiegocounty.gov/content/sdc/pds/advance/development-feasibility-analysis--dfa-.html>

²⁴ The CBT project webpage is available here: <https://engage.sandiegocounty.gov/hub-page/community-based-transportation-4>

²⁵ SANDAG Grant Resolution for the Buena Creek Specific Plan presented at the Board of Supervisors:

<https://file.sandiegocounty.gov/COB/COBPublicView?FileId=40323217>

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The following programs are in progress and are listed in chronological order of anticipated completion:

Program 3.1.1.E – Low to Moderate Inclusionary Ordinance

- In progress, anticipated completion by Summer 2026 through presenting the Draft Inclusionary Housing Ordinance for Board consideration for adoption (Table 1). The draft ordinance was presented to the Board of Supervisors in Summer 2024, at which time the Board provided direction to continue stakeholder outreach and refine ordinance requirements and incentives.²⁶
- In response to Board direction, County staff have coordinated the Inclusionary Housing Ordinance with related efforts, including the DFA and analysis by the County's VMT team, to ensure the program is economically feasible and aligned with broader housing and transportation objectives. The County has a contract and task order in place with a consultant to further evaluate the draft ordinance and its supporting economic analysis. Additional stakeholder outreach is ongoing, and staff anticipate returning to the Board for ordinance adoption in Summer 2026.
- Upon adoption, the Inclusionary Housing Ordinance will facilitate the construction of affordable housing for lower- and moderate-income households by requiring residential projects above a defined minimum size to include a specified percentage of income-restricted units, or to comply through defined alternative compliance options.

Program 3.1.1.C – Zoning Ordinance Amendments to Achieve Maximum Density

- In progress, anticipated completion by Fall 2026 through a Zoning Ordinance amendment as part of the Housing Unlocked initiative (Table 1). The County has a contract and task order in place with a consultant, supported by \$675,000 in one-time funding. County staff have initiated outreach and community engagement to inform program development, including interviews with developers and a public workshop to introduce the technical framework of the development designators. A draft ordinance amendment is anticipated to be released for public review in Summer 2026.²⁷
- The Housing Unlocked project will update the Zoning Ordinance to facilitate development on 6th Cycle RHNA sites by establishing minimum density requirements for multi-family residential districts at 70 percent of the maximum allowable density, ensuring sites are utilized efficiently to meet housing goals.

Program 3.1.1.K – Expand Eligibility of Checklist Exemptions

- In progress, anticipated completion by Fall 2026 through revisions to development review forms and procedures as part of the Housing Unlocked project²⁸ (Table 1).
- The Housing Unlocked project includes updates to the County's Design Review Checklist Exemption forms to expand eligibility for site plan exemptions and waivers. These revisions are intended to reduce administrative barriers and allow for more qualifying projects to utilize streamlined review pathways consistent with objective standards.

²⁶ The Draft Inclusionary Housing Ordinance and more information can be found on the project website here:
<https://www.sandiegocounty.gov/content/sdc/pds/advance/housingstudy.html>

²⁷ The Housing Unlocked project website can be found here:
<https://www.sandiegocounty.gov/content/sdc/pds/longrangeplanning/housing-unlocked.html>

²⁸ The Housing Unlocked project website can be found here:
<https://www.sandiegocounty.gov/content/sdc/pds/longrangeplanning/housing-unlocked.html>

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- In addition, a Grading Ordinance Amendment and Expanded By-Right Housing Program are currently underway, with anticipated completion in Summer 2027.²⁹ These efforts will further expand Objective Design Standards, supporting additional opportunities for streamlined processing, including increased eligibility for by-right approvals. Together these coordinated actions advance the objective of reducing discretionary review where feasible and improving predictability for projects.

Program 3.1.3.A – Zoning Ordinance Cleanups

- In progress, anticipated completion by Fall 2026 through Zoning Ordinance amendment as part of the Housing Unlocked project³⁰ (Table 1).
- The Housing Unlocked project will amend the Zoning Ordinance development designators, which establish development standards such as height, building type and setbacks for properties, to ensure a range of housing types and densities can be accommodated and that zoning standards more effectively facilitate development at the maximum density allowed by the General Plan.

Program 3.3.2.A – Group Homes for Seven or More

- In progress, anticipated completion by Fall 2026 through revisions to development review forms and procedures as part of the Housing Unlocked project³¹ (Table 1).
- The Housing Unlocked project includes updates to forms to improve clarity, consistency and objectivity in the review and approval of large group homes consistent with the Housing Element's fair housing objectives.

Program 3.6.5.A – Removal of Constraints to Multi-Family Housing in Areas of Opportunity

- In progress as reported to the Board on November 19, 2025, through a Board memorandum, which documented streamlining measures, incentive mechanisms, and educational tools that are reducing constraints on multi-family housing (four or more units) in areas of higher opportunity.³² Anticipated completion by Fall 2026 through Zoning Ordinance amendment as part of the Housing Unlocked project (Table 1).³³ Key actions include:
 - Board-directed Removing Barriers to Housing Initiative, which established guaranteed review timelines for 100% affordable housing, emergency shelters, workforce housing, and projects located in vehicle miles traveled (VMT)-efficient or infill areas, improving certainty and feasibility for multi-family development.³⁴
 - Development and implementation of ministerial review pathways and updated application materials enabling by-right approval of qualifying housing projects consistent with AB 1397, reducing discretionary review barriers for eligible multi-family projects.

²⁹ More information on the Grading Ordinance Update and Expanded By-Right Housing Program can be found here:
<https://www.sandiegocounty.gov/content/sdc/pds/ceqa/POD-21-005.html>

³⁰ The Housing Unlocked project website can be found here:
<https://www.sandiegocounty.gov/content/sdc/pds/longrangeplanning/housing-unlocked.html>

³¹ The Housing Unlocked project website can be found here:
<https://www.sandiegocounty.gov/content/sdc/pds/longrangeplanning/housing-unlocked.html>

³² The Fall 2025 Board memorandum, Housing Initiatives Update including project specific links, can be found here:
<https://file.sandiegocounty.gov/COB/COBPublicView?FileId=41084567>

³³ The Housing Unlocked project website can be found here:
<https://www.sandiegocounty.gov/content/sdc/pds/longrangeplanning/housing-unlocked.html>

³⁴ The Removing Barriers to Housing Board Letter is available here:
<https://file.sandiegocounty.gov/COB/COBPublicView?FileId=28075492>

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- Educational outreach and implementation tools developed by the Housing Legislation team, including interactive maps, checklists, and guidance materials supporting use of State streamlining laws such as SB 9, SB 6, SB 684, AB 803, and AB 2011, which directly advance Housing Element commitments to promote and facilitate multi-family housing.³⁵
- These actions are coordinated with and supported by related Housing Element programs, including those being addressed by the Housing Unlocked project, Inclusionary Housing Ordinance, Senior & Starter Homes initiative, Separate Sale of ADUs, and the County's existing Density Bonus Program, which together provide additional incentives and regulatory clarity for multi-family housing in areas of opportunity.

Program 3.6.6.C – Negative Environmental, Neighborhood, Housing and Health Impacts

- In progress, anticipated completion by end of 2027 through partnership with San Diego State University (SDSU) and additional County actions building off DFA, work to analyze agricultural impacts, and a Zoning Ordinance Amendment for battery energy storage systems (Table 1).
- County actions will address the negative impacts associated with the siting and operation of industrial, agricultural, waste storage, and energy production in disadvantaged and environmental justice communities.

Program 3.6.6.G – Place-Based Strategies in Low-Resource Communities and Environmental Justice Communities

- In progress, anticipated completion by end of 2027 via partnership with San Diego State University (SDSU) and additional County actions building off of DFA and CBT (Table 1).
- Actions will implement place-based anti-displacement strategies to revitalize and preserve low resource and environmental justice communities and reduce displacement risk.

Program 3.6.6.F – Twin Oaks Community Plan Update

- In progress, anticipated completion by early 2029 through the Buena Creek Specific Plan and implementation of the Sustainable Land Use Framework, which is replacing the traditional community plan update approach for the Twin Oaks area (Table 1).
- As a focused implementation component of this effort, the County is also preparing the Buena Creek Specific Plan, supported by \$750,000 in grant funding from San Diego Association of Governments (SANDAG), to develop detailed land use and zoning standards for the Buena Creek station area. The Specific Plan will build upon DFA findings and related community-based planning work to refine development capacity, support housing production, and address fair housing considerations within the North County Metro subregion.
- Together, the Sustainable Land Use Framework and Buena Creek Specific Plan functionally replace the Twin Oaks Community Plan Update by advancing refined land use policies, zoning tools, and implementation strategies that are aligned with Housing Element objectives, fair housing goals, and regional transportation investments.

As evidenced throughout this letter, the County continues to make meaningful progress implementing Housing Element programs, with six more programs to be completed by the end of 2026 and the remaining three completed by 2029, ensuring the County will be in full compliance

³⁵ Information on Housing Laws in Action, including checklists and maps, can be found here:
<https://www.sandiegocounty.gov/content/sdc/pds/longrangeplanning/housing-legislation.html>

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with our Housing Element obligations by the end of this housing cycle. The County also goes beyond the Housing Element requirements, supporting housing-related initiatives across the enterprise and across the San Diego region. The County's efforts are illustrated by meeting or exceeding our RHNA allocations in three of the four income categories and the construction of 721 affordable housing units on County-owned land in the incorporated cities in 2025. Thank you for the opportunity to provide this information and highlight the County's contributions to housing in the region. We value and look forward to our continued collaboration. If you have any questions regarding the program status updates, please contact Jennifer Savage, Chief of Planning & Development Service's Housing Division, at (619) 884-0932 or via email at Jennifer.Savage@sdcounty.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dahvia Lynch', with a long, sweeping horizontal line extending to the right.

Dahvia Lynch, Deputy Chief Administrative Officer
Land Use and Environment Group
County of San Diego

CC:

Ebony N. Shelton, Chief Administrative Officer, County of San Diego
Vince Nicoletti, Director, Planning and Development Services, County of San Diego
David Estrella, Director, Housing and Community Development Services, County of San Diego

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Table 1: Summary of Requested Housing Element Implementation Program Status Updates

Number	Housing Element Program Name	Status	Timeline	Related Project(s)
3.1.1.H	Housing Yields in Mixed-Use Zones	Complete	Fall 2024	Opportunities for Streamlining Affordable and Attainable Housing
3.1.4.A	Zoning Ordinance Amendments for Accessory Dwelling Units (ADUs)	Complete	Summer 2023 Early 2025	Housing Zoning Ordinance Update Director's Determination
		Additional Action	Early 2026	ADU Zoning Ordinance Amendment
3.2.1.A	Density Bonus Ordinance Update	Complete	Summer 2023 Early 2025	Housing Zoning Ordinance Update Director's Determination
3.6.5.B	Enhanced Housing Choices and Affordability in Areas of Opportunity, including Rancho Santa Fe	Complete	Spring 2023	Removing Barriers to Housing
		Additional Action	Summer 2027	PEIR & Expanded By-Right Housing program
3.6.6.B	Conserved and Improved Assets in Areas of Lower Opportunity and Concentrated Poverty	Complete	Fall 2025	Development Feasibility Analysis Community Based Transportation Program
		Additional Action	Early 2029	Buena Creek Specific Plan
3.1.1.E	Low to Moderate Inclusionary Ordinance	In Progress	Summer 2026	Inclusionary Housing Ordinance
3.1.1.C	Zoning Ordinance Amendments to Achieve Maximum Density	In Progress	Fall 2026	Housing Unlocked
3.1.1.K	Expand Eligibility of Checklist Exemptions	In Progress	Fall 2026	Housing Unlocked Expanded By-Right Housing Program & Grading Ordinance Update
3.1.3.A	Zoning Ordinance Cleanups	In Progress	Fall 2026	Housing Unlocked
3.3.2.A	Group Homes for Seven or More	In Progress	Fall 2026	Housing Unlocked
3.6.5.A	Removal of Constraints to Multi-Family Housing in Areas of Opportunity	In Progress	Spring 2023 Summer/ Fall 2026	Removing Barriers to Housing Housing Legislation Implementation & Outreach Inclusionary, Housing Unlocked, etc.
3.6.6.C	Negative Environmental, Neighborhood, Housing, and Health Impacts	In Progress	End of 2027	SDSU Capstone Additional County actions
3.6.6.F	Twin Oaks Community Plan Update	In Progress	Early 2029	Sustainable Land Use Framework Buena Creek Specific Plan
3.6.6.G	Place-Based Strategies in Low-Resource Communities and Environmental Justice Communities	In Progress	End of 2027	SDSU Capstone Additional County actions