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CALIFORNIA HOUSING DEVELOPMENT

The Role of Local Commissions on Completion Time

By Matthew J. Aini

California has been suffering from a “housing crisis” for the past several years, an issue which many have regarded as a symptom of a housing supply shortage. Many researchers, policymakers, journalists, and voters alike have pointed to the relatively (at least compared to other states) slow pace of entitling proposed housing projects as a major culprit for why California’s housing shortage persists. These “entitlements” generally include zoning-related permits (e.g. site development permit) and environmental review determinations (e.g. California Environmental Quality Act, CEQA). Importantly, despite the reforms at the state level, local governments have almost exclusive control on the number of local commissions and committees (“land use approval bodies”) that a housing project needs to seek approval from on a project. This paper provides evidence of a positive correlation between the length of time that California housing projects take to acquire land-use entitlements with the number of local land-use approval bodies (such as planning commissions and design review commissions) that have jurisdiction over said entitlements. Using data points on over forty local jurisdictions of varying sizes and geographies (e.g. Central Coast, Los Angeles Area, Bay Area, Central Valley), this paper confirmed the hypothesis with statistical significance in six different development contexts. In the other two regressions, which concerned affordable housing and mixed-income housing project approval timelines, respectively, there was a negative relationship between this approval time and the number of approval bodies. An additional two development contexts, single family and multifamily projects requiring a full scale environmental impact report (EIR) did not reach statistical significance in the regression tests.

I. Introduction and overview

In a political climate in which the cost of living is often at the top of voters’ minds, housing is by far a subject meriting political discussion in California. Housing not only constitutes the largest portion of the typical household budget but is also a key indicator of financial security, among a myriad of other life outcomes.¹ The rise of housing costs in California has well surpassed the rate of inflation and real wage growth over the past several decades.² Essentially, the status quo of housing in California is widely understood through two phenomena: 1) smaller and

1 Soomin Ryu and Lu Fan, “The Relationship Between Financial Worries and Psychological Distress Among U.S. Adults,” *Journal of Family and Economic Issues* 44, no. 1 (2023), <https://doi.org/10.1007/s10834-022-09820-9>.

2 Mac Taylor, *California’s High Housing Costs: Causes and Consequences*, Legislative Analyst’s Office, March 17, 2015, <https://www.lao.ca.gov/reports/2015/finance/housing-costs/housing-costs.pdf>.

older housing units in this state costing as much if not more than a much larger and new single-family property in another state; and 2) high levels of homelessness relative to the rest of the country. While there exists a dearth of research and media investigating the scale of California's housing issues, research on the causes of high housing costs and related solutions is an area rapidly developing in academia and gray literature.³

Exploring such causes and solutions requires, at least for this paper, accepting the following diagnosis regarding California's housing market: there has been a large and worsening supply shortage of housing units in the state as construction has slowed. According to a 2015 report from the California Legislative Analyst's Office (LAO), California housing costs have gone from about 30 percent above the national average in 1980 to roughly 150 percent above the national average in 2015.⁴ During this period, there has been a marked lag in housing production relative to the projected increase in housing demand over the past few years. As a reference point, the Little Hoover Commission reported that by 2000, California had reached its eleventh straight year of housing production falling below the targeted housing demand.⁵ This is not a trend that has wavered either in recent years, with active for-sale home listings decreasing by over half between 2020 and 2021 alone.⁶

The phenomenon of a "shortage" in California is not oblivious to the political conversation in California, with incumbent Governor Gavin Newsom having pledged to build 3.5 million units by 2025 during his 2018 bid for governor.⁷ While Newsom has embraced state policy actions regarding housing costs, most notably the dozens of housing bills he has signed into law, California is yet to meet this goal, nor shake off its reputation as a more difficult place to build housing than other parts of the country.^{8,9} To understand how past and present policy actions in CA have failed to eliminate the housing shortage, a review of existing literature unpacking the underlying factors behind it is useful.

In terms of thinking about the cost of building housing, and how said costs equate to it being "difficult" to build housing in California, it is helpful to think about development costs in terms of three categories: hard costs (including construction labor, equipment, and raw materials), soft costs (development fees, financing costs, consultants, taxes), and land (land acquisition and financing, site preparation). While there exist macro factors beyond California impacting development costs (tariffs, supply chain backlogs, and the interest rate environment), land use policies can hold considerable influence on the margins in making housing projects viable.¹⁰ Notably, in its pro forma model of costs for a 120-unit apartment building across four regions in California, the UC Berkeley Turner Center finds that environmental costs struggle to be economically viable even in the best-case scenario.¹¹ The assumptions embedded in this best-case scenario reflect several points of criticism about California's approach to housing development relative to other regions in the US. For example, affordable housing fees, which are commonly applied by local governments to market-rate projects, were assumed away in the previously mentioned Turner Center Pro Forma.¹² Moreover, "development impact fees" such as the aforementioned have been shown

3 Taylor, *California's High Housing Costs*.

4 Taylor, *California's High Housing Costs*.

5 Michael E. Alpert, *Rebuilding the Dream: Solving California's Affordable Housing Crisis*, Little Hoover Commission, May, 2002, <https://lhc.ca.gov/wp-content/uploads/Reports/165/Report165.pdf>.

6 *Issue Brief: COVID's Impact on California Housing*, Little Hoover Commission, April, 2021, <https://lhc.ca.gov/wp-content/uploads/Reports/258/Report258.pdf>.

7 Ezra Klein, "I Have Some Questions for the Democrats Who Want to Run California," *The New York Times*, May 8, 2026, <https://www.nytimes.com/2026/05/08/opinion/ezra-klein-podcast-housing-forum.html>.

8 "Governor Newsom Signs Bipartisan Housing Package and Launches Prop 1 Homekey+ Initiative," Governor Gavin Newsom, September 19, 2024, <https://www.gov.ca.gov/2024/09/19/governor-newsom-signs-bipartisan-housing-package-and-launches-prop-1-homekey-initiative/>.

9 Klein, "I Have Some Questions."

10 David Garcia et al., *Making It Pencil: The Math Behind Housing Development (2023 Update)*, Turner Center for Housing Innovation, UC Berkeley, December 2023, <https://turnercenter.berkeley.edu/wp-content/uploads/2023/12/Making-It-Pencil-December-2023.pdf>.

11 Garcia et al., *Making It Pencil*.

12 Garcia et al., *Making It Pencil*.

to average over \$20,000 per unit in some jurisdictions.¹³ Another factor assumed away in the development case study was needing a full-scope environmental impact report (EIR) under the California Environmental Quality Act (CEQA), which in many cases is preferred despite the considerable cost and several months delay involved because of the risk of CEQA litigation.^{14,15} While it may be relatively straightforward to compare the estimated cost of developer fees between different states and localities, in order to understand entirely how “difficult” it is to build in one jurisdiction versus another, we must answer the following: Does the number of land use-related approval entities in a city or county hold a definite impact on the time needed to complete a housing project?

For context, entitlements are the approvals which a proposed development needs in order to be deemed compliant with local regulations and thus allowed to commence construction. California stands out for requiring multiple entitlements depending on the jurisdiction and granting said entitlements on a *discretionary basis*.¹⁶ Importantly, these entitlements not only are discretionary, but can be spread by one or more entities created by the city, county, or state.¹⁷ Planning commissions, historical preservation/review boards, design/architectural review boards, and the California Coastal Commission all present examples of additional stakeholders holding a direct veto point on a housing project. While there has been research conducted on a micro-level to evaluate the housing delays in individual jurisdictions such as San Francisco and Los Angeles, this research question is yet to be directly addressed on a statewide level:^{18,19} Does the number of land use-related approval entities in a city or county hold a definite impact on the time needed to complete a housing project?

By answering this question, one can better understand a critical component of the development timelines, making housing so costly in California. To that end, this paper hypothesizes the following:

H_1 (Hypothesis 1): There will be a positive relationship between the number of land use-related commissions/boards in a locality and their typical timeline for granting housing entitlements.

II. Methodology

To evaluate the above hypothesis, the primary data set employed in this paper is the California Residential Land Use Survey (CRLUS), in tandem with raw data collected from municipal codes and county charters.^{20,21} The CRLUS dataset was compiled by the Turner Center for Housing Innovation at UC Berkeley between 2017 and 2018. The CRLUS dataset is intended to characterize the housing development regulations of the 482 local jurisdictions in California at the time of the study.²² The Turner Center collected this information via a qualitative survey of each jurisdiction, with responses coming from a staff representative of each city/county, such as planning department directors. While data for every jurisdiction is not available in the public dataset, responses for over 272 jurisdictions are publicly available, with 208 unique data points measured for each city/county.²³ Of particular

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- 13 Hayley Raetz et al., *Residential Impact Fees in California: Current Practices and Policy Considerations to Improve Implementation of Fees Governed by the Mitigation Fee Act*, Turner Center, California Department of Housing and Community Development, August 5, 2019, <https://www.hcd.ca.gov/policy-research/plans-reports/docs/impact-fee-study.pdf>.
 - 14 Garcia et al., *Making It Pencil*.
 - 15 Christopher S. Elmendorf and Timothy G. Duncheon, “When Super-Statutes Collide: CEQA, the Housing Accountability Act, and Tectonic Change in Land Use Law,” *Ecology Law Quarterly* 49, no. 3 (2022), <https://doi.org/10.15779/Z387H1DN66>.
 - 16 Moira O’Neill et al., *Examining the Local Land Use Entitlement Process in California to Inform Policy and Process*, Center for Law, Energy & the Environment, UC Berkeley Law, February, 2018, <https://www.law.berkeley.edu/wp-content/uploads/archive/2019/02/Examining-the-Local-Land-Use-Entitlement-Process-in-California.pdf>.
 - 17 O’Neill et al., *Examining the Local Land Use Entitlement Process*.
 - 18 Moira O’Neill et al., *Examining Local Law, Policy, and Planning Practice on Development in San Francisco Using CALES*, California Department of Housing and Community Development, 2023, <https://www.hcd.ca.gov/sites/default/files/docs/policy-and-research/plan-report/ucb-examining-local-law-policy-planning-practice-on-development-in-sf-using-cales.pdf>.
 - 19 Emily Jacobson, *The Dysfunctional Metropolis: Reforming Los Angeles’s Land Use Planning and Entitlement*, California YIMBY Education Fund, 2023, https://cayimby.org/wp-content/uploads/2023/09/LA-Dysfunctional_Metropolis-Report.pdf.
 - 20 Sarah Mawhorter and Carolina Reid, “California Land Use Survey Data,” Turner Center for Housing Innovation, UC Berkeley, 2018, <https://turnercenter.berkeley.edu/california-land-use-survey-data/>.
 - 21 “California Local Codes and Charters,” Institute of Governmental Studies, UC Berkeley, <https://igs.berkeley.edu/library/california-local-government-documents/codes-and-charters>.
 - 22 Mawhorter, “California Land Use Survey Data.”
 - 23 Mawhorter, “California Land Use Survey Data.”

interest for this paper will be the series of questions in the survey pertaining to the typical approval time for a five-plus-unit housing project. Through a series of multiple-choice questions paraphrased below, the CRLUS provides ten key data points that will be the subject of the regression analysis in the following section of this paper:²⁴

1. What is the typical approval time for a housing project entitlement under the following circumstances?
 - a. Single-family housing project; zoning compliant
 - b. Multifamily housing project; zoning compliant
 - c. Single-family housing project; conditional use permit or variance needed
 - d. Multifamily housing project; conditional use permit or variance needed
 - e. Single-family housing project; general plan and/or zoning amendment needed
 - f. Multifamily housing project; general plan and/or zoning amendment needed
 - g. Single-family housing project; EIR required
 - h. Multifamily housing project; EIR required
2. How does the approval time for the following compare to market rate projects?
 - a. Fully affordable housing project
 - b. Mixed-income housing project

In the case of the first question stated above, the answer choices available to respondents ranged from less than two months to more than a year, as well as an N/A option.²⁵

In the latter set of questions, the responses available ranged from three-plus months faster than market rate projects to three-plus months slower than market rate projects. In this paper, these responses were converted to a numeric scale in the dataset such that they could be regressed against the independent variable.²⁶ See Appendix B to see the layout and response options of the questions aforementioned in greater detail.

The new data collected for this paper will give us the independent variable for the regression analyses: the number of land use approval authorities applicable to a local jurisdiction (excluding the city council/board of supervisors). Abbreviated to *max_comm* in the new dataset and the regression tables below, this metric will provide the maximum number of approval authorities that a developer would need to consult to fully entitle a housing development. As was mentioned in the previous section of this paper, by and large, these will include a planning commission at a minimum, as well as other entities a city/county may have created or be subject to. In practicality, basically every local government will be operating with a planning commission, so expect to see that the lower bound of this *max_comm* variable is actually 1 and not 0. That being said, the California Coastal Commission (CCC) was added to the *max_comm* count for cities/counties with housing in the Coastal Zone because the CCC holds land use authority over the Coastal Zone despite being a direct entity of the state. However, two other state entities with some land use authority over local cities, the San Francisco Bay Conservation and Development Commission (BCDC) and the State Lands Commission, were intentionally excluded from the *max_comm* count due to the lack of housing-zoned land under their authority.²⁷ A limitation to consider, while minor, is that the local codes/charters used to collect for the *max_comm* variable were up-to-date versions.²⁸ That being said, given the age of the sample basket of cities and the relative infrequency of new local land use boards being created, it is unlikely that the *max_comm* data is wholly incongruent with the CRLUS data on the basis of this new variable being collected at a different time.

24 Mawhorter, "California Land Use Survey Data."

25 Mawhorter, "California Land Use Survey Data."

26 Mawhorter, "California Land Use Survey Data."

27 Brian King, "The Public Trust Doctrine and Mixed-Use Development: The Proposed Golden State Warriors Arena and the Implications for Future Development on the San Francisco Bay," *UC Law Environmental Journal* 20, no. 2 (2014), https://repository.uclawsf.edu/cgi/viewcontent.cgi?article=1359&context=hastings_environmental_law_journal.

28 Institute of Governmental Studies, "California Local Codes."

Regarding the mechanisms of analysis in the next section of this paper, a series of linear regressions will be performed in which the *max_comm* variable is regressed against each data point aforementioned from the CRLUS. Importantly, for these regressions, the CRLUS data was subsetting to a sample basket of forty local jurisdictions in California, and likewise, the *max_comm* variable was solely collected for this sample basket (see Appendix A for the full list). This sample was collected as a purposive sample, with several goals in mind. Firstly, the localities selected vary in size and are located across nearly every region across the state (including the Central Valley, Central Coast, Greater Northern California, the San Francisco Bay Area, the Inland Empire, and Southern California more broadly). Secondly, this sample set corresponds in large part with the sample set of cities in the CA Development Impact Fee Study conducted by the Turner Center and the CA Department of Housing and Community Development (HCD).²⁹ The diversity of fee impact structures in that sample, combined with the diversity of jurisdictions chosen, made the similarity in these sample baskets a welcome design choice. Due to non-responses from some jurisdictions as well as some jurisdictions lacking data in the publicly available dataset, there exists some dissimilarity in the list of jurisdictions chosen in this paper. A final note here, while there were some effective non-responses in the CRLUS data being used, any jurisdiction with more than four non-responses out of the ten dependent variables was excluded from the sample set.

III. Findings and analysis

A. Evaluating approval timelines by unit type and entitlement

Table 1. Regression of the number of approval entities against the typical approval time for a single-family housing project that is consistent with the underlying zoning of the property.

Variables	Coefficient	Std. Error	t-Statistic	p-Value ³⁰
(intercept)	1.5970	0.2374	6.728	5.76e-08 ***
<i>max_comm</i>	0.2304	0.1014	2.271	0.0289 *

Table 2. Regression of the number of approval entities against the typical approval time for a multifamily housing project that is consistent with the underlying zoning of the property

Variables	Coefficient	Std. Error	t-Statistic	p-Value ³¹
(intercept)	1.5968	0.2731	5.846	1.23e-06 ***
<i>max_comm</i>	0.2810	0.1152	2.439	0.0199 *

Table 3. Regression of the number of approval entities against the typical approval time for a single-family housing project requiring a conditional use permit or zoning variance

Variables	Coefficient	Std. Error	t-Statistic	p-Value ³²
(intercept)	1.86094	0.22803	8.161	1.61e-09 ***
<i>max_comm</i>	0.30675	0.09748	3.147	0.00342 **

Table 4. Regression of the number of approval entities against the typical approval time for a multifamily housing project requiring a conditional use permit or zoning variance

Variables	Coefficient	Std. Error	t-Statistic	p-Value ³³
(intercept)	1.8756	0.2492	7.527	1.75e-08 ***
<i>max_comm</i>	0.3586	0.1050	3.417	0.00179 **

29 Raetz, "Residential Impact Fees in California."

30 "****" 0.001 "****" 0.01 "****" 0.05 "****" 0.1.

31 "****" 0.001 "****" 0.01 "****" 0.05 "****" 0.1.

32 "****" 0.001 "****" 0.01 "****" 0.05 "****" 0.1.

33 "****" 0.001 "****" 0.01 "****" 0.05 "****" 0.1.

Table 5. Regression of the number of approval entities against the typical approval time for a single-family housing project requiring a general plan or zoning amendment

Variables	Coefficient	Std. Error	t-Statistic	p-Value ³⁴
(intercept)	2.23788	0.21960	10.191	7.17e-12 ***
<i>max_comm</i>	0.41694	0.09534	4.373	0.00011 ***

Table 6. Regression of the number of approval entities against the typical approval time for a multi-family housing project requiring a general plan or zoning amendment

Variables	Coefficient	Std. Error	t-Statistic	p-Value ³⁵
(intercept)	2.25339	0.19687	11.446	3.29e-13 ***
<i>max_comm</i>	0.42081	0.08732	4.819	2.94e-95 ***

First, all of the above results are statistically significant to 0.05. In other words, the probability of these results being purely random is so low that we can interpret a relationship between each variable pair tested above. More importantly, the coefficients are all positive for the *max_comm* variable, an indication that having more commissions is correlated with longer approval times for a housing project. While there are not any cities with zero local commissions, using both the y-intercept and coefficient value from the regression formula in Table 1, a locality with only one land use approval authority would have closer to a value of 2—which would correspond to a permitting timeline of two to six months. Looking towards the remaining tables, one can deduce that a locality is generally dealing with at least that time range if not typically longer for any kind of residential project of the qualities ascribed in the table descriptions. While the non-ordinal quality of the survey responses prevents us from making inferences about non-whole numbers computed using the regression formula, the more pronounced differences in *max_comm* and the overall trend are revealed through this regression. For example, looking towards multifamily projects requiring a zoning or general plan amendment, the regression coefficient is large enough that, for the handful of cities/counties with four land-use approval authorities, there is a discernably longer “typical time” for entitlement than in those localities with only one such approval body. When comparing the magnitude of the intercepts and coefficients for each regression, one should come out with a few key takeaways. Firstly, for a given entitlement, a multifamily project will typically face a longer permitting timeline than a single-family project. Secondly, the more complex the entitlement, the longer the baseline time is for a project to get that entitlement. Thirdly, and most critically, the more rigorous the entitlement, the stronger the effect of the number of land-use approval entities on the approval time.

In practical terms, beyond validating the hypothesis laid out above, this seemingly confirms the notion that more complex local land use bureaucracies are slower at approving housing. Tying back to the conversation in this paper on existing literature, the increased number of veto points and the increased time with such bureaucratic complexity would add a risk that developers would need to account for when buying land and accruing pre-development costs.³⁶ In this way, beyond the deductive conclusion that these localities with more land use regulatory bodies are going to be slower at eliminating their housing shortage, the cost of producing new housing is going to be marginally higher here to a degree. The timeline for housing projects holds greater relevance beyond the entitlement phase as well, given that overall project timelines will add uncertainty to development returns once a project takes over a year or longer to entitle, let alone construct.³⁷ Put another way, once a project timeline lengthens enough, the probability of a recession or growing economy becomes less and less certain at the time the project is set to be rented/sold.³⁸

34 “***” 0.001 “**” 0.01 “*” 0.05 “.” 0.1.

35 “***” 0.001 “**” 0.01 “*” 0.05 “.” 0.1.

36 Garcia, “Making It Pencil.”

37 Garcia, “Making It Pencil.”

38 Garcia, “Making It Pencil.”

While there is little plausibility of reverse causality given our dependent variables, a potential confounding variable that merits attention is that city size is a more accurate predictor for both of these variables. For example, public opposition to further population growth as well as the rise of the environmental movement in the 1970s led to governance reforms expanding public input on local development in LA. Popular support for extensive public outreach and input from disadvantaged communities on new development have entrenched these processes in LA and other cities across California.³⁹ While there is no doubt that major cities such as San Francisco and Los Angeles have faced micro factors that built up their bureaucracies and in other ways may have made housing development more stringent, this alone is insufficient to explain the data. Many of the local jurisdictions with three or more land use entities were generally coastal jurisdictions such as Arcata and Santa Barbara, or wealthier towns such as Palo Alto. None of the aforementioned examples are particularly close in population to San Francisco let alone Los Angeles. Moreover, two of the top ten cities in California by population that were a part of the sample, Long Beach and Sacramento, had only two land-use-related entities excluding their city council. In summary, while city population could very well be a factor in housing entitlement timelines, it is far from explaining away this data.

B. Evaluating approval times for EIR projects

Ultimately, the regressions ran here were not found to be statistically significant, thereby limiting the predictive value and any possible related takeaways from those two regressions. In all likelihood, the lack of statistical significance likely arises from the fact that CEQA analysis is a uniform activity regardless of the number of commissions a project needs to go through, thereby rendering the *max_comm* variable less useful in these cases.⁴⁰ At present, the rise of CEQA reform and streamlining legislation over the past several years does have significant implications for the timelines of certain residential projects.⁴¹ Particularly, given the fact that the CRLUS was conducted several years ago, one could deduce that these legislative changes provide both a challenge in interpretability of such data for a present-day context, as well as potentially undermine the value of any successive takeaways in terms of further analysis or policy action.

C. Evaluating affordable and mixed-income housing project timelines

Table 7. Regression of the number of approval entities against the relative time to approve affordable housing projects (compared to market rate projects)

Variables	Coefficient	Std. Error	t-Statistic	p-Value ⁴²
(intercept)	3.5077	0.3311	10.60	6.69e-13 ***
<i>max_comm</i>	-0.2929	0.1414	-2.07	0.0453 *

Table 8. Regression of the number of approval entities against the relative time to approve mixed-income housing projects (compared to market rate projects)

Variables	Coefficient	Std. Error	t-Statistic	p-Value ⁴³
(intercept)	3.43987	0.18680	18.414	<2e-16 ***
<i>max_comm</i>	-0.17584	0.07983	-2.203	0.0338 *

Interestingly, one would find here that while the results in the case of the above two regressions are not only statistically significant, they indicate a negative correlation between the number of commissions in a city/county and the approval time relative to market-rate projects. Granted, one should take into account the fact that the dependent variable is not measured in typical entitlement time unlike the previous regressions discussed above,

39 Jacobson, "The Dysfunctional Metropolis."

40 Elmendorf, "When Super-Statutes Collide."

41 Elmendorf, "When Super-Statutes Collide."

42 "****" 0.001 "****" 0.01 "****" 0.05 "****" 0.1.

43 "****" 0.001 "****" 0.01 "****" 0.05 "****" 0.1.

and rather expressed in terms of how much typically “faster” or “slower” a project is to entitle than a market rate project. Moreover, looking at the intercept values, both of the regressions straddle around three and a half. For the CRLUS, a value of 3 for these two survey questions would equate with a project taking basically the same amount of time as a market-rate equivalent project, while a value of 4 would be one to two months longer than market-rate projects. In short, in addition to the negative relationship for the number of commissions in this case, the affordable and mixed-income projects do not inherently take much longer or shorter than market-rate development. In reflection of these results, one potential confounding variable, in this case, that could explain this relationship is that cities with more commissions also have more money in an affordable housing fund which goes to these types of housing projects, and relatedly receives less pushback from relevant approval entities. Without further investigation and data, such a claim is admittedly uncertain.

Nevertheless, given the time that has passed since the CRLUS dataset was generated, one should note that there has been a wave of bills enacted since 2018 that have streamlined the affordable housing approval process, such as some of the legislation passed this year.⁴⁴ As a part of such streamlining, some of these projects can get entitlements from local staff without needing planning commission or city council approval. This is not to deny the correlation found above, but rather to note that it holds less salience than the initial six regressions discussed prior in this section.

IV. Conclusion and topics for further consideration

In summary, for most types of housing projects, there is a positive correlation between the number of approval authorities a developer must go to for a proposed housing project and the amount of time it takes for that project to get the necessary entitlements, as was hypothesized. The number of land use approval bodies has an even larger impact on the length of time to acquire entitlements for multifamily projects and where more complex zoning changes are necessary. However, this inverse of this was found to be true if a proposed housing project was a below-market-rate (BMR) affordable housing project. Upon confirming this relationship, existing literature points to the idea that housing projects taking longer to entitle are more costly and at greater risk of not being completed. In light of the correlation examined in this paper, cities with comparatively longer permitting timelines ought to consider how their process for housing approvals could be accelerated.

Given the positive correlation confirmed in this paper, there are a few different viewpoints that policymakers could take in assessing how to reduce the typical housing entitlement timeline. Firstly, by treating the number of land use approval bodies as a causal factor on a housing entitlement timeline, local and state policymakers could consider reforms to consolidate or restrict the number of approval bodies that a project must consult with. One notable example of this occurred in the City of Sacramento, which merged its Planning Commission and Design Review Commission into a singular Planning and Design Review Commission back in 2012, with the aim of reducing redundancy and strengthening coordination in the entitlement process.⁴⁵ While there were local concerns primarily regarding competency and capacity to handle the functions of what was at the time two commissions, the Sacramento City Council tried to balance these concerns by expanding the new commission to thirteen members and requiring professional qualification for certain seats.⁴⁶ More generally, the consolidation approach echoes a more recent push in some major California cities to reduce administrative inefficiency by merging commissions and departments with related functions.^{47,48} In the newly formed city of Mountain House, CA, the city operates

44 Governor Gavin Newsom, “Governor Newsom Signs Bipartisan Housing Package.”

45 “Title 2 and Title 17 Changes to Consolidate the Design and Planning Commissions,” City of Sacramento City Council, February 28, 2012, 1–12, https://sacramento.granicus.com/MetaViewer.php?view_id=22&clip_id=2918&meta_id=380424.

46 City of Sacramento City Council, “Title 2 and Title 17,” 4–5.

47 Patrick Hoge, “SF Task Force Recommends Culling Commissions, Giving Mayor More Power,” *San Francisco Examiner*, January 28, 2026, https://www.sfoxaminer.com/news/politics/sf-task-force-recommends-culling-commissions-giving-mayor-more-power/article_d92ac18b-bda4-47ed-8a2a-cc89f8c11bc8.html.

48 City News Service, “LA City Council Turns Three Departments into a Single Entity,” *Los Angeles Daily News*, May 26, 2026, <https://www.dailynews.com/2026/05/26/la-city-council-turns-three-departments-into-a-single-entity/>.

without any land use related approval bodies aside from the city council, which could be a contributing factor, albeit marginal, to its fast pace of housing growth.^{49,50}

Alternatively, policymakers may be keen on legally mandating that their entitlement process take a shorter length of time altogether, as opposed to indirectly influencing timelines through restructuring the entitlement process altogether. Relatedly, California state law does exactly that, as SB 35 (extended by SB 423 until 2036) requires that a local jurisdiction make a final determination on approving or denying a code-compliant project application within 90 days (180 days for projects over 150 days).⁵¹ Critically though, there are a number of eligibility requirements for a housing project to reap the benefits of the state law, many of which significantly affect its applicability.⁵² Briefly, some notable criteria include that a project proposal be multifamily, in an urban infill site (e.g. not surrounded by agricultural property), no destruction of locally designated historic sites, and union labor requirements (with certain exceptions for below-market-rate housing projects).⁵³ As a result, there are additional avenues in which local governments or the state could expand the use of a mandatory timeline to different types of housing projects.

Further, policymakers might additionally consider the potential for confounding factors that may bridge the correlation observed in this paper. For example, one might argue that both the number of land use commissions in a locality and the length of time required to entitle a housing project are both a result of a greater level of NIMBYism in that city/county. That being said, changing NIMBYism is squarely a matter of political culture as opposed to policy reform. However, ministerial zoning does seem to address the above factor as well as the two variables in the regression analyses. By creating an expedited entitlement checklist controlled by planning staffers rather than local commissions or elected officials, ministerial zoning streamlines housing while largely limiting political influence over housing approvals.⁵⁴ California lawmakers have enacted several laws creating a ministerial process for different types of housing projects such as BMR housing projects on religious institution property, mixed income and BMR housing on commercial properties, and Accessory Dwelling Units, among others.⁵⁵ It is important to note though that the scope of these types of bills are largely limited to BMR and mixed income housing due to political opposition.⁵⁶

Given the statistical significance found here with the scale of this data project, an immediate consideration for additional study would be expanding the scope beyond a sample set of cities. While this paper sought to prove the viability of this *max_comm* variable without evaluating such a value for every local jurisdiction, there would be a great deal of practical value in estimating the new estimated effects with nearly every locality in an ideal case. However, doing so would be easier said than done without needing to follow up on missing data from the CRLUS.

While the dependent variables chosen for this paper were sufficient in evaluating the hypothesis, within CRLUS data and other data sets such as the California Housing Elements, there exist many other opportunities to understand how the number of land use entities in a city/county relates to certain outcomes. On a purely practical note, the more quantitative analysis done in this realm, the higher the potential that targeting the number of commissions/committees could hold for policymakers. At the core of this research's relevancy is the idea that California has not particularly found a "correct" method of setting up land use at the local level.

Something that would help us gain even greater insight into how local commissions slow down/speed up housing development is distilling the impacts of individual categories of commissions. For the purposes of this paper, each land use approval body tallied for a city/county was counted equally. While statistical significance in

49 "Title 2: City Administration," in *Mountain House Municipal Code*, City of Mountain House, California, https://library.municode.com/ca/city_of_mountain_house/codes/code_of_ordinances?nodeId=TIT2CIAD_DIV1CICO.

50 Bay Area News Group, "Map: California's Fastest-Growing Cities, Two of Them in the Bay Area," *The Press Democrat*, May 5, 2026, <https://www.pressdemocrat.com/2026/05/05/map-californias-fastest-growing-cities/>.

51 "Streamlined Ministerial Approval Process," California Department of Housing and Community Development, April, 2026, <https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/smap-sb-35-sb-423.pdf>.

52 California Department of Housing and Community Development, "Streamlined Ministerial Approval Process."

53 California Department of Housing and Community Development, "Streamlined Ministerial Approval Process."

54 O'Neill et al., *Examining the Local Land Use Entitlement Process*.

55 Ryan A. T. Lenney, *The Law of the Land: An Analysis of Recent Reforms to Housing Policy in California* (Senior thesis, Claremont McKenna College, 2025), https://scholarship.claremont.edu/cmc_theses/3884/.

56 Lenney, *The Law of the Land*.

the above regression analyses confirms the significance of the overall complexity of a local land use regime, does a zoning adjustment board, for example, have the same impact on entitlement timelines as a historical review commission? Remedying this approach may require a much more refined quantitative approach if not a more qualitative approach altogether.

While this paper illuminates the impact of adding more commissions or committees in the entitlement process, the studies on specific jurisdictions are needed to examine how different local commission structures (planning commission vs. design review commission vs. zoning adjustment board, etc.) add different levels of time and scrutiny towards housing projects. While the dependent variables worked within this paper provided rough estimations of entitlement timelines, the insights somewhat end there without following up with either more pointed quantitative data or recording stakeholder perspectives on the process in an individual jurisdiction. For example, in the Los Angeles case study, a key concept explored which macro data on its own may not point to is the concept of “councilmanic privilege,” by which a councilperson held a soft veto on proposed development projects within their districts.⁵⁷ This provides insights that allow for more targeted policy remedies in individual jurisdictions, such as the same researcher behind the aforementioned case study recommending that rather than decreasing the number of planning commissions in LA, the City Council expands its deference to neighborhood planning commissions.⁵⁸

Building onto the previous point, is that future research should also factor in the level of discretion carried out by staff members in local jurisdictions. Admittedly, there would be a lot more logistical work and difficulty involved in capturing data about staff performance in this realm, both qualitative and quantitative. Be that as it may, understanding performance quality of staff in land use approvals could help contextualize a key factor to development in certain jurisdictions, particularly where local decision-makers on land use such as councilmembers and planning commissioners are typically more deferential to staff. With such an understanding, enforcement of state housing laws could be further improved at promoting local governments to approve housing with greater frequency and efficiency. More importantly, to the extent we think about policy reform either at the state, regional, or local level to optimize local land use regimes, it is research such as that conducted in this paper which is a necessary step to inform what the ideal governing structure to minimize housing delays or prolonged timelines. Ultimately, as long as the gaps in housing production and housing development timelines persist between California and the rest of the country, this area of scholarship remains of the utmost importance.

V. Appendix A: List of cities/counties included in the sample for regression

The jurisdictions listed below are cities unless noted otherwise:

1. Anaheim	11. Healdsburg	21. Oakland	31. San Diego
2. Antioch	12. Huntington Beach	22. Ontario	32. San Francisco (City and County)
3. Arcata	13. Imperial	23. Palo Alto	33. San Jose
4. Bakersfield	14. Irvine	24. Pasadena	34. Santa Barbara
5. Carlsbad	15. Jackson	25. Rancho Cordova	35. Santa Cruz
6. Chico	16. Long Beach	26. Redwood City	36. Santa Maria
7. Contra Costa County (unincorporated)	17. Los Angeles	27. Riverside	37. Stockton
8. Dublin	18. Merced	28. Roseville	38. Truckee
9. Fairfield	19. Modesto	29. Sacramento	39. Tustin
10. Glendale	20. Novato	30. San Bernardino County (unincorporated)	40. West Hollywood

⁵⁷ Jacobson, “The Dysfunctional Metropolis.”

⁵⁸ Jacobson, “The Dysfunctional Metropolis.”

VI. Appendix B: Copy of related CRLUS form questions to local jurisdictions

A. Approval time

What is the typical time to secure preliminary plat/plan approval for the most common applications for the following types of development, starting from the time the application is deemed complete?

	Less than 2 months	2 to 6 months	6 to 12 months	More than a year	The times vary so much it is impossible to say	No recent projects of this type
<i>Projects with 5 or more units consistent with general plan and zoning</i>						
Single-family detached	O	O	O	O	O	O
Multifamily or townhome	O	O	O	O	O	O
<i>Projects with 5 or more units that require a conditional use permit or variance</i>						
Single-family detached	O	O	O	O	O	O
Multifamily or townhome	O	O	O	O	O	O

B. Approval time

What is the typical time to secure preliminary plat/plan approval for the most common applications for the following types of development, starting from the time the application is deemed complete?

	Less than 2 months	2 to 6 months	6 to 12 months	More than a year	The times vary so much it is impossible to say	No recent projects of this type
<i>Projects with 5 or more units that require a general plan or zoning amendment</i>						
Single-family detached	O	O	O	O	O	O
Multifamily or townhome	O	O	O	O	O	O
<i>Projects with 5 or more units that require an EIR or similar environmental review process</i>						
Single-family detached	O	O	O	O	O	O
Multifamily or townhome	O	O	O	O	O	O

C. Factors that affect review and approval times

In your experience, do projects with affordable housing require more or less time than market-rate projects?

	3+ months faster	1–2 months faster	Little to no difference	1–2 months slower	3+ months slower
<i>Projects with 5 or more units that require a general plan or zoning amendment</i>					
Single-family detached	☐	☐	☐	☐	☐
Multifamily or townhome	☐	☐	☐	☐	☐
<i>Projects with 5 or more units that require an EIR or similar environmental review process</i>					
Single-family detached	☐	☐	☐	☐	☐
Multifamily or townhome	☐	☐	☐	☐	☐

Select the top three factors that most often lead to longer review and approval times for project applications in your jurisdiction.

- ☐ Incomplete or unviable applications
- ☐ Project applicant is slow to respond
- ☐ Limited staff available to process volume of applications
- ☐ Stringent or complex zoning ordinances
- ☐ Number of discretionary approvals and public meeting required
- ☐ Approval bodies meet infrequently
- ☐ Multiple government agencies involved in the approvals process
- ☐ CEQA review
- ☐ Public opposition to development
- ☐ Other (describe) _____

VII. Appendix C: Non-Statistically Significant Regression Results

Table 9. Regression of the number of approval entities against the typical approval time for a single-family housing project requiring an environmental impact report (EIR)

Variables	Coefficient	Std. Error	t-Statistic	p-Value ⁵⁹
(intercept)	3.24706	0.20952	15.948	2.88e-15 ***
<i>max_comm</i>	0.17647	0.09248	1.908	0.0667 .

Table 10. Regression of the number of approval entities against the typical approval time for a multifamily housing project requiring an environmental impact report (EIR)

Variables	Coefficient	Std. Error	t-Statistic	p-Value ⁶⁰
(intercept)	3.39672	0.20426	16.629	<2e-16 ***
<i>max_comm</i>	0.11803	0.08921	1.323	0.195

59 *** 0.001 ** 0.01 * 0.05 . 0.1.

60 *** 0.001 ** 0.01 * 0.05 . 0.1.

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