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ATTORNEYS AT LAW

Summary of Key Housing Statutes Affecting Local Land Use Practices[1]

May 5, 2023

		Section/link	*Notes*	*Prevailing wage*
1.	Housing Accountability Act	65589.5[2]	Located within the Housing Element law.	N/A
2.	Housing Crisis Act of 2019	66300-66301	SB 330	No
3.	Density Bonuses	65915		No
4.	Second Units; lot splits	65852.21	SB 9	No
5.	ADUs	65852.1, 65852.2	SB 9 additions	No
6.	Streamlined Upzoning	65913.4	SB 10	Yes
7.	The Middle-Class Housing Act of 2022	65852.24	SB 6	Yes
8.	Affordable Housing and High Road Jobs Act of 2022	65912.100-65912.105	AB 2011	Yes
9.	Permit Streamlining Act Amendments	65950	Housing Crisis Act of 2019 (SB 330)	N/A
10.	Housing on Property Owned by Local Education Agencies	65914.7		N/A
11.	Determination of Historic Sites	65913.10		N/A
12.	Small Infill (under ten units)	65913.11		No
13.	Five Meeting Limitation for Housing Projects Conforming to Objective Standards	65905.5		N/A
14.	No Net Loss	65863		N/A

[1]This chart does not include statutes affecting the Coastal Zone.
[2] All references are to the Government Code unless noted otherwise.

1. **Housing Accountability Act ("HAA")** (Found within the Housing Element law.)

A. Link: 65589.5

B. Summary

1) Limitations on denying or conditioning housing projects. Local agencies shall not disapprove, or condition specified affordable projects unless it makes certain findings:

- It has adopted a housing element and it has met or exceeded its regional fair share numbers;
- There are specific, adverse impacts upon public health or safety.
- Denial or conditioning is required by state or federal law;
- Land is zoned for agricultural or resource use;
- The development is inconsistent with both the general plan and zoning at the time the application was deemed complete. (Gov. Code, § 65589.5(d).)

The lead agency must "otherwise comply" with CEQA and make any required findings. (Gov. Code, § 65589.5(e).)

Disapproval is deemed to occur if the agency fails to comply with Section 65950(a) (Permit Streamlining Act). (Gov. Code, § 65589.5(h)(6).)

2) Burden of Proof. When a housing project complies with objective general plan and development standards in effect when the application is deemed complete, the local agency must make specific findings, supported by substantial evidence. (Gov. Code, § 65589.5(J).)

3) Consistency Determinations. Local government must now make consistency determinations within thirty days of the application being deemed complete (projects less than 150 units) or sixty days if over 150 units. (Gov. Code, § 65589.5(j)(2).)

4) The HAA includes numerous provisions of legal standing, burden of proof and recovery of attorney's fees and costs in the event of litigation.

5) Preliminary Applications (Gov. Code, §§ 65589.5(o), 65941.1)

The HAA creates a developer-optional preliminary application process.

A housing development will be deemed to have completed the preliminary application process by providing specified information regarding:

(a) site characteristics;
(b) the planned project (units, square footages, parking spaces);
(c) existing uses;
(d) identification of major physical changes;
(e) certain environmental concerns (e.g., wildland fire, wetlands, flood zone, fault lines);
(f) facts related to any potential density bonus, below market rate units;
(g) historical or cultural resources;
(h) certain coastal zone-specific concerns;
(i) the number of units to be demolished; and
(j) the location of recorded public easements.

With limited exceptions, housing developments will only be subject to those ordinances and policies in effect when the completed preliminary application is submitted. (Gov. Code, § 65589.5(o)(2).)

The public agency must make any historic site determination at the time the developer has complied with the preliminary application checklist. That determination can only be changed if archaeological, paleontological, or tribal cultural resources are found during development.

To facilitate the preliminary application process, all public agencies must compile a checklist that specifies what is required to complete a development application. The application checklist must now be made available in writing and on the public agency's website. Under SB 330, the local agency now has additional disclosure obligations when rejecting an application as incomplete and cannot request anything that is not identified on the application checklist.

The developer has 180 days from the submittal of the preliminary application to submit a development application.

C. HCD Technical Assistance Memorandum

2. Housing Crisis Act of 2019 ("HCA")

A. Link: 66300-66301

B. Summary

1) SB 330 also freezes many development standards in cities and counties in U.S. Census Bureau-designated urbanized areas, starting January 1, 2020. The Department of Housing and Community Development is responsible

for confirming the affected cities and counties that are located in urbanized areas by June 30, 2020. HCD may revise this list after January 1, 2021, to address changes in urbanized areas based upon the new census data.

2) Among other changes, the bill provides that where housing is an allowable use, an affected public agency, including its voters by referendum or initiative, may not change a land use designation (general plan or zoning) to remove housing as a permitted use or reduce the intensity of residential uses permitted under the general plan and zoning codes that were in place as of January 1, 2018, unless the city concurrently changes the standards applicable to other parcels to ensure there is no net loss in residential capacity.

3) Affected cities and counties are also prohibited from imposing a moratorium or similar restriction on a housing development, including mixed-use developments, except to specifically protect against imminent threats to public health and safety.

4) Additionally, affected cities and counties cannot enforce a moratorium or other similar restriction on a housing development until the ordinance has been approved by HCD.

5) As of January 1, 2020, affected cities and counties are prohibited from imposing or enforcing subjective design standards that are adopted after the law went into effect on housing developments where housing is an allowable use. Objective standards may be adopted and are limited to design standards that involve no personal or subjective judgment by a public official. They must be verifiable by reference to an external and uniform benchmark available to both the applicant and the public official prior to application submittal.

6) Affected cities and counties are also prohibited from establishing or implementing any growth-control measure adopted by the voters after 2005 that:

   (a) limits the number of land use approvals for housing annually;
   (b) acts as a cap on the number of housing units that can be constructed; or
   (c) limits the population of the city or county.

   (Gov. Code, § 66300(D))

7) The HCA does not apply in areas designated as Very High Fire Hazard Severity Zones.

8) Nothing in the HCA supersedes CEQA.

C. HCD Preliminary Application Form

3. Density Bonuses

A. Link: 65915

B. Summary

The density bonus law has been part of California land use practice since 1979. Through amendments, the law has become sprawling, unbelievably complex, and nuanced statute, with different rules and qualification requirements applying to the different types of covered projects. The statute clocks in at nearly nine thousand words, so this is a statute where you have to study the fine print and all of the cross references. This summary is no substitute for the statute.

One common and significant benefit is the potential to override maximum density limits created by general plans or zoning. Qualifying projects include housing projects with 10% affordable to low- or moderate-income families, or 5% of which are affordable to very low-income families. Childcare facilities can also trigger benefits under the statute. Benefits to qualifying projects include density increases, concessions, waiver of development standards and reduction in parking standards.

Projects qualifying under the 10% moderate income option require that all of the units be for sale to the public.

The 2022 amendments extend the density bonus statute to shared housing projects, as well as low VMT 100% affordable projects. The 2023 amendments also include a formula for calculating base density. Commercial projects partnered with qualifying residential projects can also exercise statutory benefits.

4. Second Units / Lot Splits (SB 9, SB 10)

A. Link: 65852.21

B. Summary

Government Code sections 65852.21 and 66411.7 were added to promote small-scale neighborhood residential development by streamlining the process for a homeowner to create a duplex or subdivide an existing lot. Any new housing created as a result of this SB 9 legislation must meet a specific list of qualifications that ensure the protection of historic districts, environmental quality, and existing tenants vulnerable to displacement. The bill establishes a statewide path for homeowners seeking to create a duplex or subdivide an existing

residential parcel by ensuring local governments approve qualified applications without discretionary review, eliminating overly burdensome requirements that slows qualified application.

Housing Development Must Satisfy Several Location Qualifying Criteria:

- The project is in a city or urbanized portion of an unincorporated county.
- The project site is not located on or in any of the following:
  - Prime farmland, or farmland of statewide importance;
  - Wetlands;
  - Within a very high fire severity zone;
  - A hazardous waste or hazardous list sit;
  - Within a delineated earthquake fault zone;
  - Within a 100-year flood zone;
  - Within a floodway;
  - Identified for conservation n an adopted natural community; conservation plan;
  - Habitat for protected species; or
  - Land under conservation easement.

Restrictions on Impacts on Affordable and Historic Buildings:

- The project cannot require demolition or alteration of any housing if 1) housing is restricted affordable housing, 2) subject to rent control, or 3) contains tenant occupied housing in the last three (3) years.
- The project site cannot be withdrawn from the rental market (i.e., under the Ellis Act) within the past 15 years.
- The project does not propose demolition of more than 25 percent of the easing exterior walls unless wither 1) the local ordinance allows more demolitions, or 2) the site has not been occupied by a tenant in the past three (3) years.
- The project site is not within a historic district or property included on the California Historical Resources Inventory or within a site that is designated or listed as a city or county landmark or historic property or district pursuant to a city or county ordinance.

Local Agencies (Cities and Counties) Authority and Zoning Limitations:

To be considered for ministerial approval, the proposed development project must meet certain local development criteria:

- A local agency may impose objective zoning, subdivision and design review standards providing such objective standards do not

preclude the construction of either of the two units being less than eight hundred square feet in area.

- No setbacks are required for an existing structure, or a structure constructed in the same location and to the same dimensions as an existing structure. In other circumstances, the local agency may require four-foot side and real yard setbacks.
- Parking of no more than one space per dwelling unit is allowed, except no parking required for projects a) within a half-mile walking distance of a high-quality transit corridor or a major transit stop or b) within one block of car share.
- A local agency may deny such a housing development project if there is a written finding that the project would create a specific adverse impact upon public health and safety or the physical environment that there is no way to mitigate.
- The rental of any unit created must be for a term longer than 30 days.
- The California Coastal Act still applies, except that no public hearing is required for Coastal Development Permits for housing developments pursuant to this legislation.
- A local agency may not be required to permit an accessory dwelling unit (ADU) or Junior ADU (JADA) in addition to the second unit it there is a lot split.
- A local agency may not reject housing solely on the basis that a project proposes adjacent or connected structures provided that the structures meet building code safety standards and are sufficient to allow separate conveyance.

If these criteria are satisfied, the local agency must approve the project ministerially (i.e., without discretionary review or hearings). Projects approved ministerially are not subject to the California Environmental Quality Act (CEQA).

Lot Splits To Be Approved Ministerially Pursuant to a Parcel Map:

In addition, SB 9 (Gov. Code, § 66411.7) requires qualifying lot splits to be approved ministerially pursuant to a parcel map, upon meeting a number of criteria, including many of the same criteria as specified above pursuant to Gov. Code, § 65852.21). Additional criteria including the following:

- Each parcel must be at least 40 % of the original parcel's size
- Each parcel must be at least 1,200 square feet in lot size unless the local agency permits smaller lot size per ordinance.
- There cannot be a sequential lot split on the same parcel, nor can there be a lot split if the owner of the parcel being subdivided (or someone working in concert with that owner0 has subdivided an adjacent parcel pursuant to this lot split legislation.

- No right-of-way dedication or off-site improvement may be required.
- The parcel must be limited to residential use.
- An affidavit that the applicant intends to use one of the housing units as a principal residence for at least three years from the date of approval is required.
- The local agency shall not require a condition that requires correction of nonconforming zoning conditions.
- For each parcel created, a local agency is not required to permit more than two dwelling units on a parcel.

A local agency may require as, conditions of approval:

- Easements for public services and facilities.
- Access to the public right-of-way

Cities' Ability to Craft Objective Standards Consistent with the Housing Crisis Act of 2019 (SB 330):

Government Code section 65852.21(b) explicitly authorizes local agencies to "impose objective zoning standards, objective subdivision standards, and objective design review standards" provided the standards to not physically preclude the construction of up to two 800 square feet units, subject to certain other restrictions.[3] However, this provision does not directly address the application of the Housing Crisis Act of 2019. (Gov. Code, § 66300(b)(1)(A).) Government Code section 66300 limits an affected county or city[4] in its ability to amend its general plan, specific plans, or zoning code in a way that would improperly reduce the intensity of residential developments. "Reducing the intensity of land use includes," but is not limited to, reductions to height, density, or floor area ratio, new or increased open space or lot size requirements, new or increased setback requirements, minimum frontage requirements, or maximum lot coverage implications, or any other action that would individually or cumulatively reduce ethe site's residential development capacity. (Gov. Code, § 66300(b)(1)(A).) Affected cities and counties are prohibited from reducing the intensity of land use "below what was allowed under the land use designation or zoning ordinances of the affected county or affected city, as applicable, as in

[3] To be considered "objective", such standards must involve "no personal or subjective judgement by a public official" and are uniformly verifiable by an external and unform benchmark that is available and knowable by both the developer and the public official prior to submitting an application. (Gov. Code, §§ 65852.21(i)(2); 66411.7(m)(1).)

[4] Affected cities is any city, including a charter city, that is in an urbanized areas or urban cluster, as designed by the US Census Bureau. Any city of a population of less than 5,000 and not located within an urbanized area is exempt. Based on HCD's determination, 445 of the 482 cities statewide qualify as "affected cities." Counties have a similar definition with 22 of the 58 counties being qualified as "affected counties."

effect on January 1, 2018." (Gov. Code, § 66300.) Since the typical jurisdiction's zoning ordinance on that date would not have allowed the projects authorized by SB 9, subjecting SB 9 projects to standards different from what apply to traditional single-family homes is not necessarily reducing the intensity of land use below that allowed on January 1, 2018.

A reduction in the intensity of land use is defined as an action that would reduce a site's "residential development capacity." That phase is not defined and is not used anywhere else in the Planning and Zoning Law. However, the most logical way to understand SB 330's requirements is to prohibit a change in zoning standards would reduce the number of housing units that can be constructed and not the size of these units. This is consistent with the findings the Legislature made when adopting SB 330 that the development of more housing units was necessary to address the housing crisis. In the context of multi-family housing, changes in zoning standards, such as a reduction in height, can directly impact the number of housing units that can be built on a site. The same is true for SB 9, where state law already restricts the number of units that can be constructed. For example, a strict regulation limiting SB 9 units to eight hundred square feet regardless of other standards would obviously limit the size of units built pursuant to SB 9 but would not limit the number of units. Accordingly, many types of regulations will arguably not reduce the "residential development capacity" of sites in single family zoning districts. SB 330 does not restrict a city's ability to adopt a regulation specific to SB 9 projects if the regulation does not reduce "residential development capacity." Thus, the presence or absence of similar objective standards in a city's zoning code to other types of residential projects arguably does not impact whether the city may adopt additional objective standards that are only applicable to SB 9 projects if such standards are consistent with state law.

Examples of Discretion a City or County Does Have on SB 9 Projects:

As previously stated, SB 9 allows cities and counties to impose objective zoning, subdivision and design review standards that do not conflict with SB 9. Local agencies may also elect to impose less stringent requirements than those contained in state law. If local agencies regulations do not violate SB 9 (such as the requirement to allow at least an eight hundred square foot unit), local agencies have discretion to:

Development Standards:

- **Front Yard Setbacks.** Cities may retain the standard front yard setback requirements or be more permissive and reduce the mandatory setbacks.

- **Side and Rear Setbacks.** Local agencies may be more permissive that then four four-foot state law maximums.
- **Heights.** SB 9 does not directly regulate minimum or maximum heights or limits on stories. However, for multi-family units, be aware of the restrictions of SB 330.
- **Maximum Size.** Must allow units to be at least eight hundred square feet. Local Agencies may increase the maximum size.
- **Parking.** At most one parking space per unit is allowed – local agencies can opt to require less parking.
- **Design Requirements.** May authorize objective design review standards under SB 9 that do not physically preclude construction of an eight hundred square foot unit. Local agencies have implemented a number of requirements that would qualify as objective design standards:
    - Eave protection
    - Roof pitch
    - Façade materials and minimum articulation
    - Color requirements (e.g., matching the color of the primary dwelling)
    - Design requirements for features such as windows, porches, balconies, etc.
    - Exterior lighting direction and shield
    - Height requirements for units, entrances, fences, retaining walls, and landscape.
- **Incentives.** Local agencies may include incentives to comply with specific standards. For example, in exchange for applicants volunteering to comply with setback requirements that are more stringent than otherwise allowed by SB 9, a local agency could allow additional height or stories for such units.

Lot Splits:

Requires for qualifying parcels, ministerial approval of two-unit housing developments in single-family zoning districts and would allow single-family parcels to be subdivided into two lots.

C. HCD memorandum https://www.hcd.ca.gov/docs/planning-and-community-development/sb9factsheet.pdf

5. ADUs

A. Link: 65852.1, 65852.2

B. Summary

Units Defined. The three types of housing units that are described in SB 9 and related ADU Law are presented below to clarify which development scenarios are (and are not) made possible by SB 9.

Primary Unit. A primary unit (also called a residential dwelling unit or residential unit) is typically a single-family residence or a residential unit within a multi-family residential development. Examples of primary units include a single-family residence, a duplex, a four-plex.

Accessory Dwelling Unit. An ADU is an attached or detached residential dwelling unit that provides complete independent living facilities for one or more person and is located on a lot with a proposed or existing primary residence. It includes permanent provisions for living, sleeping, eating, cooking, and sanitation on the same parcel on which the single-family or multifamily dwellings or will be situated.

Junior Accessory Dwelling Unit. A Junior ADU is a unit that is no more than five hundred square feet in size and contained entirely within a single-family residence. A Junior ADU may include separate sanitation facilities or may share sanitation facilities with the existing structure.

Number of ADUs Allowed. ADUs can be combined with primary units in a variety of ways to achieve the maximum unit counts provided for under SB 9. SB 9 allows for up to four units to be built in the same lot area typically used for a single-family home. The calculation varies slightly depending on whether a lot split is involved, but the outcomes regarding total maximum unit counts are identical.

Lot Split. When a lot split occurs, the local agency must allow up to two units on each lot resulting from the lot split. In this situation all unit types (i.e., primary unit, ADU, and Junior ADU) count toward this two-unit limit. For example, the limit could be reached on each lot by creating two primary units, or a primary unit and an ADU, or a primary unit and a Junior ADU. By building two units on each lot, the overall maximum of four units allowed under SB 9 is achieved. (Gov. Code, § 66411.7(j).) Note that the local agency may choose to allow more than two units per lot if desired.

No Lot Split. When a lot split has not occurred, the lot is eligible to receive ADUs and/or Junior ADUs as it ordinarily would under ADU law. Unlike when a project is proposed following a lot split, the local agency must allow, in addition to one or two primary units under SB 9, ADUs and /or JADUs under ADJU Law.

6. **HCD Accessory Dwelling Unit Handbook:**

7. Ministerial Multifamily

A. Link: 65913.4

B. Summary

This statute provides for ministerial multifamily approvals. The statutory criteria are extensive, the one code section exceeds 9,000 words. Generally, the statute applies in urbanized cities and counties, for jurisdictions not meeting fair share housing requirements. The project must be specified affordability requirements. There are geographically described areas where the statute cannot be used (e.g., wetlands, very high fire hazard severity zones, habitats.) The project is subject to prevailing wage rules. While the project is exempt from CEQA, it is subject to tribal consultation. Projects are subject only to objective development standards.

8. The Middle-Class Housing Act of 2022 (SB 6, 2022)

A. Link: 65852.24

B. Summary

This section promotes the re-purposing of commercially zoned property for residential use. The legislation "deems" residential as an allowed use on commercially zoned property without the need for a rezoning. The bill can be applied in urban areas, whether within the city or an urbanized county.

The development project may be subjected to discretionary approval, thus potentially triggering CEQA.

Other requirements include:

- Paying prevailing wage;
- The site must be twenty acres or less;

- There are no inclusionary requirements set by statute, but such requirements may be mandated by local ordinance;
- The statute may be used in conjunction with the density bonus law, and
- The minimum density is the density specified in the local housing element as necessary to serve low-income households.

8. Affordable Housing and High Road Jobs Act of 2022 (AB 2011, 2022)

A. Link: 65912.100-65912.105

B. Summary

Unlike SB 6, this legislation creates a ministerial pathway for housing projects in commercial zones. This legislation relies upon two distinct pathways to facilitate affordable housing for commercially zoned property. Under the first option, all of the residential units must be affordable and dedicated to lower income households, based upon a cost or rent consistent with the California Tax Credit Allocation Committee. The second option focuses on commercial corridors (defined within the statute.) If the development is an owner-occupied project, 30% of the units must be affordable to moderate income households or 15% affordable to lower income households. If a rental project, 15% of the units need to be affordable to lower income or 8% of the units must be affordable to very low income, or it must comply with locally adopted inclusionary requirements, if higher. This legislation sets forth standards for project density (maximum and minimum), setbacks and height limits.

These projects are exempt from CEQA.

Prevailing wage requirements apply.

9. Permit Streamlining Act Amendments

A. Link: 65950

B. Summary

Permit Streamlining/Application Processing:

The Housing Crisis Act of 2019 (SB 330) also amended the Permit Streamlining Act. Local agencies are not allowed to prohibit more than five hearings when reviewing a housing development that complied with the general plan and zoning

code objective standards when the application was deemed complete. "Hearing" is broadly defined to include any workshop or meeting of a board, commission, council, department, or subcommittee. (Gov. Code, § 65905.5.)

A housing development project shall be deemed consistent, compliant, and in conformity with an applicable plan, program, policy, ordinance, standard, requirement, or other similar provision if there were substantial evidence that would allow a reasonable person to conclude that the housing development project is consistent, compliant, or in conformity.

The definition of a housing development project relies upon the HAA definition (Government Code section 65589.5(h)(2) which includes:

- Residential units only;
- Mixed use with at least two-thirds of the square footage devoted to residential uses;
- Transitional or supportive housing.

A proposed housing development project is not inconsistent with the applicable zoning standards and criteria, and shall not require a rezoning, if the housing development project is consistent with the objective general plan standards and criteria, but the zoning for the project site is inconsistent with the general plan. If the local agency complies with the written documentation requirements of paragraph (2) of subdivision (j) of section 65589.5, the local agency may require the proposed housing development project to comply with the objective standards and criteria of the zoning that is consistent with the general plan; however, the standards and criteria shall be applied to facilitate and accommodate development at the density allowed on the site by the general plan and proposed by the proposed housing development project.

Additionally, a housing development cannot be required to rezone the property if it is consistent with the objective general plan standards for the property. The public agency may require the housing development to comply with the objective zoning code standards applicable to the property, but only to the extent they facilitate the development at the density allowed by the general plan.

SB 330 also shortens the time frames for housing development approvals under the Permit Streamlining Act. Local agencies now have 90 days, instead of 120 days, following certification of the environmental impact report, to approve the project. For low-income projects seeking tax credits or other public funding, that time frame is 60 days.

10. Housing on Property Owned by Local Education Agencies

A. Link: 65914.7

B. Summary

Projects are ten units or more, and deed restricted for at least 55 years. These are rental units, aimed at serving employees of educational institutions, construction on school property. The development site must qualify as infill, and adjacent to property zoned for residential uses as a principal permitted use. Development of the site is subject to local objective standards.

11. Determination of Historic Sites (Gov. Code, § 65913.10)

A. Link: 65913.10

B. Summary

For purposes of any state or local law, ordinance, or regulation that requires the city or county to determine whether the site of a proposed housing development project is a historic site, the city or county shall make that determination at the time the application for the housing development project is deemed complete. A determination as to whether a parcel of property is a historic site shall remain valid during the pendency of the housing development project for which the application was made unless any archaeological, paleontological, or tribal cultural resources are encountered during any grading, site disturbance, or building alteration activities.

> (b) For purposes of this section:
>
> (1) "Deemed complete" means that the application has met all of the requirements specified in the relevant list compiled pursuant to Section 65940 that was available at the time when the application was submitted.
>
> (2) "Housing development project" has the same meaning as defined in paragraph (2) of subdivision (h) of Section 65589.5.

12. Small Infill (3 to 10 Units)

A. Link: 65913.11

B. Summary

For qualifying small residential projects, this statute:

1) Prohibits local governments from imposing a FAR less than 1.0 for projects consisting of 3-7 units. For projects of 8-10 units, the city or county cannot impose an FAR of less than 1.25.
2) Deny a housing project located on a legal lot on the basis that the lot size is below minimum parcel size.

Eligible projects must meet the following criteria.

1) Located in multi-family or mixed use zone
2) Not located within an historic district
3) The site must be in an urbanized area or urban cluster.
4) The city or county can still apply other zoning or development standards including height and setback standards.

13. Five Meeting Limitation for Housing Projects Conforming to Objective Standards

A. Link: 65905.5

B. Summary

For projects complying with objective standards, there is a five-meeting limitation. This has to be read within the context of projects subject to the Permit Streamlining Act. This statute recognizes and requires compliance with CEQA, which limits its potential beneficial effects.

14. No Net Loss

A. Link: 65863

B. Summary

Limits actions by local governments which require or permit the reduction of residential densities on parcels recognized as part of the inventory of parcels required to meeting Housing Element targets.

C. HCD Memorandum (2019)