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From Application to Entitlement: Making Housing Supply Enforceably Affordable in the Suisun Expansion

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Abstract: The proposed Suisun Expansion in Solano County, California, presents a large-scale housing framework during an ongoing entitlement process. Applicant materials describe up to 65,217 homes in the 20-Year Plan, while the City's environmental-review documents identify approximately 173,913 dwelling units at full buildout. These figures establish substantial proposed capacity but do not, by themselves, specify income eligibility, affordable rents or prices, affordability duration, administration, or enforcement. Using a bounded qualitative document analysis through July 14, 2026, this decision-based teaching case distinguishes applicant proposals, governmental records, agency concerns, public-facing representations, and teaching assumptions. Recent research on housing supply, inclusionary housing, implementation capacity, staged development, and participation informs the author-developed Promise to Production (P2P) framework. Students compare three teaching alternatives: supply and missing-middle housing with monitoring, an explicit mixed-income package before entitlement, and phased affordability performance gates. The case asks what evidence, commitments, implementation mechanisms, and enforceable protections City staff should seek before later project-specific entitlement and Development Agreement decisions. It does not predict project outcomes or provide a legal opinion.

Keywords: affordable housing, housing development, development agreements, implementation, land-use entitlement

Introduction

Housing affordability policy involves both expanding overall supply and ensuring access at costs tied to specified household incomes. Recent research finds that added supply can reduce rents or rent growth and trigger moving chains that reach middle- and lower-income segments (Been et al., 2025; Bratu et al., 2023). Those effects do not determine who receives income-restricted housing, what affordability standard applies, how long it lasts, or how compliance is enforced. Inclusionary-housing research likewise shows that outcomes vary with program design and market context (Wang et al., 2025; Wang & Balachandran, 2023). In California, state reviewers also face practical limits when verifying whether local governments carry out their housing plans (Zheng, 2026, pp. 204–205). Large projects also unfold through sequential decisions under uncertainty, making staged commitments relevant when later information can materially affect feasibility (Kantianis et al., 2026).

The Suisun Expansion illustrates this tension. The applicant transmitted an entitlement package on October 3, 2025, and the City recorded receipt on October 8. Requested actions include a General Plan Amendment, Specific Plan, Area Plan and zoning changes, Vesting Tentative Subdivision Map, Development Agreement, and related amendments (California Forever, 2025a; Sramek & Metcalf, 2025). The City's Notice of Preparation initiated environmental review and identified separate roles for Suisun City, LAFCO, and other agencies (City of Suisun City, 2025b). This teaching case places students in the role of Elena Marquez, an invented municipal housing adviser. The factual record closes on July 14, 2026;

the July 28 memorandum deadline is instructional. Her question is: What affordability evidence, measurable commitments, implementation mechanisms, and enforceable protections should City staff seek and recommend before the housing component advances into later project-specific entitlement and Development Agreement decision-making?

Problem Statement

Recent evidence supports housing production but does not establish that development capacity alone produces housing with defined income eligibility, rent or purchase-price limits, duration, or compliance protections (Been et al., 2025; Bratu et al., 2023; Wang et al., 2025). Suisun City's 2023-2031 Housing Element provides local context: 33.6% of households were overpaying for housing, including 48.8% of renters and 30.4% of owners; overpayment affected 77.7% of low-income, 74.3% of extremely low-income, and 54.2% of very-low-income households (City of Suisun City, 2023, pp. 5-6). The City's RHNA is 620 units: 160 very low, 95 low, 98 moderate, and 267 above moderate income (p. 8). These are historical planning indicators, not measurements of 2026 conditions.

Against that need, the applicant proposes up to 65,217 homes in the 20-Year Plan, the City's environmental record identifies approximately 173,913 units at full buildout, and the Specific Plan requires an average minimum density of 30 dwelling units per net acre across most residential sites (California Forever, 2025b, p. 61; City of Suisun City, 2025b, pp. 7-8; Sramek & Metcalf, 2025, pp. 1-2). These figures measure proposed capacity and density, not guaranteed construction or income-restricted production. In the bounded record reviewed through July 14, 2026, a complete project-wide structure specifying target income groups, required restricted-unit quantities or equivalent obligations, price standards, duration, minimum funding commitments, administration, monitoring, and default or remedy provisions was not identified. The decision problem is therefore one of timing and implementation: which affordability terms must be defined early enough to remain measurable and enforceable, and which can remain adaptable while material financing, infrastructure, market, and implementation uncertainty is resolved?

Purpose Statement

The purpose of this bounded, documentary, decision-based teaching case is to help students evaluate alternative architectures for making affordability commitments measurable, implementable, and potentially enforceable during an ongoing entitlement process. It is not a legal opinion, outcome evaluation, or forecast of housing production.

Learning Objectives

Students should be able to: (1) distinguish capacity, production, market attainability, and income-restricted affordability; (2) translate broad affordability language into measurable commitments; (3) evaluate strategies using the five dimensions of the Promise to Production (P2P) framework; (4) assign implementation functions without confusing advisory, approval, financing, implementation, and regulatory authority; and (5) defend a recommendation that addresses milestones, monitoring, triggers, default, cure, remedies, and reconsideration.

Scholarly and Conceptual Foundations

Housing supply and moving chains. Been et al. (2025) synthesize recent evidence that added housing supply generally reduces rents or slows rent growth, while Bratu et al. (2023) find that new market-rate housing in Helsinki triggered moving chains reaching middle- and low-income neighborhoods and individuals. These studies support supply as an affordability mechanism but do not define targeted income restrictions or compliance terms.

Inclusionary and income-restricted housing. Wang and Balachandran (2023) document substantial variation among more than 1,000 U.S. inclusionary-housing programs. Wang et al. (2025) find that effects vary with policy stringency, market conditions, and time

since adoption; Chapple and Song (2025) likewise report context-dependent displacement and exclusion effects in Los Angeles and San Francisco. The implication is calibration, not a universal formula.

Implementation capacity. In Southern California, local planners described difficulties documenting the redevelopment potential of nonvacant sites. State reviewers relied partly on developers and housing advocates to flag lapses in local compliance (Zheng, 2026, pp. 205–206). Van Haelter et al. (2023) show that local implementation capacity depends on combinations of organizational conditions. Here, implementation capacity means the authority, personnel, expertise, resources, relationships, and operating systems needed to deliver, administer, monitor, and report an affordability commitment.

Staged development and uncertainty. Kantianis et al. (2026) show how real-options reasoning can preserve managerial flexibility by deferring or staging urban-development investment as information changes. Applied cautiously here, staged reasoning means preserving selected flexibility while identifying which early commitments must be secured to protect the intended outcome; it does not prove that a particular Suisun affordability strategy is preferable.

Participation, legitimacy, and accountability. Van der Wel et al. (2025) show that legitimacy depends on how stakeholders experience participation and outcomes rather than on participation alone. Ambrose (2024) finds that representation in environmental-justice councils also depends on communication patterns. Because those settings differ from municipal entitlement, the limited lesson is that public presence does not itself establish substantive representation or legitimacy.

These bodies of research support three operational concepts. Enforceability means that a proposed commitment can be translated into a measurable obligation with a responsible actor, timing, verification, default, cure, and consequence. Implementation capacity concerns the institutional ability to deliver and monitor that obligation. Staged reasoning concerns which commitments must be fixed early and which can adjust as uncertainty resolves. The P2P framework is an author-developed instructional diagnostic, not a validated theory, legal standard, underwriting model, or City framework. Its five dimensions are housing need and equity; financial viability and leverage; development and implementation capacity; governmental and regulatory enforceability; and community legitimacy and accountability.

Method and Case Mechanics

The case uses a purposively bounded qualitative document analysis (Morgan, 2022). Documents were included when they formally described the proposed housing program, requested governmental approvals or implementation mechanisms, addressed agency responsibilities material to implementation or services, or provided public-facing affordability representations that could be compared with formal records. The Housing Element is used separately as contextual government evidence. Table 1 summarizes the bounded source inventory and each source's inclusion rationale and role in the case.

Table 1. Documentary Source Inventory

Source	Issuer/date	Type	Inclusion rationale / role
Application and transmittal	California Forever / Oct. 2025	Application	Entitlements; 20-Year capacity
Specific Plan	California Forever / Oct. 2025	Proposal	Density; housing forms; phasing; financing
NOP	Suisun City / Nov. 12, 2025	Government record	Full buildout; CEQA; approval structure

Source	Issuer/date	Type	Inclusion rationale / role
Reimbursement Agreement	City and applicant / June 2025	Executed agreement	City discretion; entitlement framework
FSSD materials	FSSD / Mar. 2026	Agency record	Project review; environmental/LAFCO coordination
FAQ and workshop notice	Suisun City / 2025-2026	Public communication	Affordability framing; July 14 cutoff
Housing Element	Suisun City / 2023	Planning document	Affordability; RHNA context

The factual record closes on July 14, 2026, because the City had scheduled a Development Agreement Fundamentals workshop for that date, creating a reasonable instructional boundary before later project-specific decisions (City of Suisun City, 2026). Elena Marquez and the July 28 memorandum deadline are teaching constructions. Sources were classified by provenance before interpretation; applicant proposals remained proposals, agency letters remained agency concerns or jurisdictional statements, and public-facing statements were not treated as binding conditions without formal support. The author reviewed the corpus as a single reviewer using consistent fields for capacity, beneficiaries, tenure, unit/funding/land commitments, price standards, financing, duration, responsible organization, milestones, monitoring, reporting, default, cure, and remedies. Ambiguous evidence was conservatively classified. 'Not identified' means only that the element was not located in the bounded corpus; it does not mean the term is prohibited or cannot be added later.

The author's prior compensated role as a California Forever Community Ambassador informed project awareness but is not treated as evidence. Safeguards include reliance on public records, explicit provenance, no use of nonpublic organizational information, preservation of competing alternatives, and narrow statement of negative findings. Limitations include single-reviewer coding, exclusion of private negotiations and later records, and inability to establish future production, household outcomes, participant perceptions, causation, or legal validity.

Decision Point, Authority, and Affordability Record

The decision occurs after application and environmental review began but before adoption of project-specific affordability terms or final discretionary entitlement decisions. 'Advancing' means City staff are sufficiently prepared to carry a recommended affordability position into later negotiations, analysis, and recommendations. Elena analyzes and recommends; City staff process and negotiate; the Planning Commission performs applicable review and recommendation; the City Council exercises applicable City legislative and discretionary authority; Suisun City retains independent CEQA judgment; LAFCO controls annexation or reorganization within its jurisdiction; service agencies control matters within theirs; and the developer proposes, negotiates, finances, and implements assigned obligations. The reimbursement agreement preserves City discretion and does not guarantee approval (City of Suisun City & California Forever LP, 2025, pp. 10-11).

The record distinguishes capacity from enforceable affordability. The 20-Year Plan and full-buildout figures do not guarantee construction, while the 30-unit-per-net-acre standard concerns zoning capacity. HCD explains that qualifying densities can facilitate lower-income housing but that lower-income housing commonly requires subsidy or financial assistance (California Department of Housing and Community Development, n.d.-a, n.d.-b). Public-facing City responses emphasize middle-class homeownership, missing-middle forms, varied housing sizes, renters, and owners (City of Suisun City, 2025a), but the bounded application-

stage record does not identify a complete project-wide income-restricted program. Table 2 summarizes the resulting affordability-commitment audit.

Table 2. Affordability Commitment Audit

Element	Status
Capacity, housing-form variety, density	Identified
Middle-class, missing-middle, renter/owner framing	Partially identified
Project-wide target income groups	Not identified
Required restricted-unit quantity/percentage	Not identified
Rent/ownership-price formula and duration	Not identified
Minimum affordability funding and administrator	Not identified
Affordability milestones, monitoring, default, cure, remedies	Not identified

Note. 'Not identified' is a bounded finding through July 14, 2026, not a finding that a provision cannot be negotiated or adopted later.

Affordability terms also operate within project-specific constraints. The Specific Plan anticipates phased development, annual reporting, and four broad infrastructure-financing categories: project-generated tax revenue, special assessments or district mechanisms, fees and service charges, and federal, state, or regional sources; detailed financing would evolve with development phases and market conditions (California Forever, 2025b, pp. 220-222). FSSD reported that its review would cover planning application materials, environmental documentation, LAFCO review, technical responses, and specialist analyses, with additional review costs reimbursed by the applicant (Fairfield-Suisun Sewer District, 2026, pp. 11-12). These review requirements affect timing and administrative capacity but do not establish project infeasibility.

P2P Rating Guide and Decision Rules

Table 3. P2P Rating Guide

Rating	Meaning / required justification
Aligned	Substantial fit; evidence, reasoning, managed uncertainty
Partially aligned	Material gap remains; evidence, gap, corrective condition
Misaligned	Essential condition lacking; evidence, deficiency, curability
Uncertain	Evidence insufficient or contradictory; identify missing evidence and when needed

Table 3 defines the rating rules used in the case. Worked example: an alternative may be Partially aligned on governmental and regulatory enforceability when a measurable obligation and responsible party are identified but no monitoring schedule or consequence for nonperformance is specified. The rating should identify the missing element and the condition needed to cure it. A critical deficiency is a material condition that prevents recommendation in the strategy's current form, such as assuming an unawarded subsidy is guaranteed or requiring future performance without a responsible actor, trigger, verification,

or consequence. It is not a fifth rating. No dimension is an automatic veto, but students may not average away a fundamental deficiency.

Strategic Alternatives and Decision Assignment

The following are author-developed teaching options, not formal alternatives proposed by Suisun City, California Forever, or another agency. Alternative 1, Supply and Missing-Middle First With Monitoring, allows the capacity and housing-form framework to advance without a comprehensive project-wide income-restricted package. It preserves flexibility but requires defined indicators, intended groups, review dates, benchmarks, and a corrective pathway before delay materially reduces options. Alternative 2, Explicit Mixed-Income Affordability Package Before Entitlement, seeks early specification of beneficiaries, rental and ownership components, measurable unit or funding obligations, affordability standards and duration, implementation responsibility, monitoring, milestones, and corrective provisions. It provides measurability but must distinguish committed resources from competitive or hypothetical financing and cannot treat unawarded subsidy as secured. Alternative 3, Phased Affordability Performance Gates, secures defined early commitments while allowing selected later requirements to adjust. A valid gate requires a trigger, measurable obligation, deadline, responsible verifier, default condition, cure process, and consequence; weak gates risk indefinite deferral. Table 4 compares their strengths, primary risks, and minimum conditions.

Table 4. Comparative Decision Logic

Alternative	Strength	Primary risk	Minimum condition
Supply and Monitoring	Flexibility	Corrective action too late	Benchmarks, review dates, corrective pathway
Explicit Package	Early specificity	Miscalibration	Plausible financing and implementation capacity
Performance Gates	Adaptability with early commitment	Complexity or deferral	Objective gates, verification, default, cure, consequence

Students must recommend one alternative and define its operational architecture: target income groups; rental/ownership balance; measurable units, funding, land, or assistance; affordability definition and duration; financing logic; implementation organizations; milestones; monitoring and public reporting; triggers; default; cure; remedies; and reconsideration conditions. They must also identify the strongest counterargument, the unresolved fact most likely to change the decision, and one term without which they would withdraw the recommendation.

Practical Recommendations

These are author-developed decision practices derived from the bounded record and literature, not existing Suisun City requirements or legal conclusions: (1) define intended beneficiary income groups and tenure populations; (2) convert broad objectives into measurable units, funding, land, assistance, or other verifiable performance; (3) define rent or ownership-price standards and affordability duration; (4) assign each implementation function to an institution with appropriate authority and plausible capacity; (5) test financing, infrastructure, operating, and subsidy assumptions before fixing delivery schedules; (6) pair each phase with a verifiable trigger, responsible party, verifier, default, cure, and consequence; (7) connect monitoring and public reporting to corrective action; and (8) establish defined reconsideration points without permitting indefinite deferral. Collectively, these practices translate the

documentary gaps in Table 2 and the three alternatives into decision criteria across the five P2P dimensions.

Recommendations for Future Research

Five research directions follow from the case's limits: (1) longitudinal document tracking could test whether proposed affordability commitments become binding and are fulfilled; (2) comparative case studies could examine fixed obligations versus phased performance gates; (3) implementation interviews or mixed-methods studies could test how staffing, expertise, budgets, monitoring systems, and interagency arrangements affect performance; (4) interviews, surveys, comments, meeting records, and successive agreements could examine how participation influences accountability design and perceived legitimacy; and (5) multi-case applications could test and refine the P2P framework, including interrater consistency, construct clarity, missing or overlapping dimensions, and rating reliability. These are proposed extensions, not findings of the present case.

Conclusion

The Suisun Expansion case asks a narrower question than whether a large development should proceed: when does broad housing capacity become sufficiently specified to support measurable, implementable, and accountable affordability commitments? The bounded record establishes substantial proposed capacity, density, housing-form flexibility, and an ongoing entitlement process, while a complete project-wide affordability architecture was not identified through July 14, 2026. That finding does not mean such provisions cannot be negotiated or adopted later.

Housing supply and targeted affordability are not mutually exclusive. Recent research supports supply as a mechanism that can moderate rents and broaden access, while inclusionary-housing and implementation research shows that targeted outcomes depend on policy design, financing, organizational capacity, timing, administration, and compliance. The P2P framework provides an instructional structure for judging those relationships but does not identify a preferred alternative, assign numerical scores, establish legal validity, or claim empirical validation. The three alternatives place risk differently: monitoring emphasizes flexibility, an explicit package emphasizes early specificity, and performance gates combine early commitments with adaptability. Across all three, the transferable questions remain: Who benefits? What performance is required? Who is responsible? When must it occur? How will it be verified? What happens if it does not occur?

Author Disclosure

Public records form the factual basis of this teaching case. Elena Marquez and the memorandum deadline are instructional constructions. The author previously served as a compensated California Forever Community Ambassador and no longer works for the organization. California Forever did not direct, fund, review, or receive advance access to this manuscript, and no nonpublic information was used.

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