

## Sheetz Ruling Under Renewed Attack as Case Returns to the Supreme Court

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In *Sheetz v. County of El Dorado*, the U.S. Supreme Court unanimously held that constitutional limits on land-use “exactions” can apply even when a fee is set by a generally applicable law, not just when it is imposed through an individualized, case-by-case permitting decision.

The case involved a \$23,000 traffic impact mitigation fee assessed as a condition of a residential building permit under a countywide fee program. The Supreme Court rejected the idea that a locality’s exactions can avoid scrutiny simply because the fee is adopted by ordinance. The Supreme Court sent the case back for California courts to apply the Nollan/Dolan framework. This required the lower courts to determine whether the fee had an “essential nexus” to the government purpose and whether the fee was “roughly proportional” to the impacts of George Sheetz’s single-family manufactured home.

What the California Court of Appeal said on remand: In its July 29, 2025, decision, the California Court of Appeal applied Nollan/Dolan and again ruled for the County. The Court of Appeal concluded the fee had an “essential nexus” to the County’s interest in addressing traffic impacts from new development and was “roughly proportional” based on the methodology and record supporting the fee program.

What’s next: Sheetz has again filed a petition for writ of certiorari asking the Supreme Court to review the California Court of Appeal’s post-remand decision, and NAHB is filing an amicus brief in support of cert.

## New Land Use Tools from NAHB

### Interactive State and Local Maps

The [Mapping Zoning Reform Across the United States](#) tool is a digital resource to help users quickly understand where and how zoning and land use reforms are being adopted at the state, county and local levels. These maps translate complex policies into an accessible and visual format, allowing users to see patterns, gaps and momentum in zoning reform across the country. The goal is to provide a clear, data-driven picture of the regulatory changes that can meaningfully expand housing supply and improve affordability.

The [Impact Fee Legislation State-by-State Map](#) provides builders, policymakers and housing advocates a clearer picture of where and how impact fees are authorized across the country. It was developed to quickly see and compare which states authorize impact fees, under what conditions and where enabling statutes create opportunities or obstacles for housing supply.

## Reports and Guides

The [Moratoria on Residential Development Permits: A Toolkit Report](#) is a practical, legally-grounded resource designed to help builders and HBAs respond to the growing use of local permit moratoria that threatens housing supply and affordability. From defining moratoria and spotting legal red flags to outlining strategic and legal challenges, this report equips members with the tools needed when residential development may be unjustly put on hold.

The [Residential Density and Municipal Revenue](#) report and video show how different residential development patterns affect municipal fiscal health. Using data-driven analysis and real-world examples, the research illustrates how housing type and density influence tax revenue, infrastructure costs and overall economic productivity. For HBAs, this provides a credible tool to demonstrate to local officials that broader housing choices, including townhomes, missing middle housing and mixed-use developments, support both affordability and long-term fiscal stability.

The [USPS Clarifies Cluster Mailbox Guidance](#) article outlines the U.S. Postal Service’s requirements for cluster mailbox units (CBUs) in new housing developments. NAHB encourages members to review it and the Postal Service’s [Guide for Builders and Developers](#) and share any ongoing and relevant development challenges with our land use team. Inconsistent local guidance on CBUs nationwide has delayed projects and added unnecessary costs. The letter and guide clarify policies and reaffirm that all new developments are expected to use CBU delivery as outlined in the guide.

## Register Now for the 2026 Spring Leadership Meeting

[Register now](#) for the 2026 Spring Leadership Meeting and Legislative Conference, held in Washington, D.C., June 9-13. Review the agenda to make sure you don’t miss any key events!

NAHB’s most important annual lobbying event, the Legislative Conference, takes place in conjunction with the Spring Leadership Meeting, and is a unique opportunity for members to speak one-on-one with their elected representatives on Capitol Hill and to push for housing policies that benefit the residential construction industry. Learn more about the [Legislative Conference](#) or review the [National Meeting Resource Guide](#).