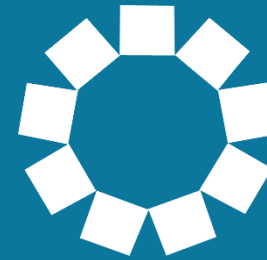
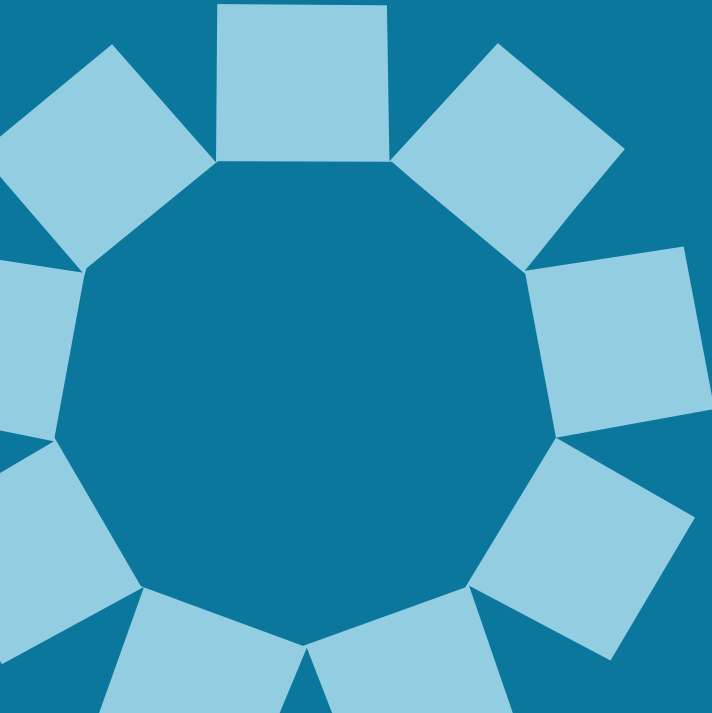


# RHNA Subregions Overview

March 2026



**ASSOCIATION  
OF BAY AREA  
GOVERNMENTS**



# What is the Association of Bay Area Governments (ABAG)?

ABAG represents **109 cities, towns, and counties** in the region

ABAG partners with MTC on **Plan Bay Area** – the region’s long-range plan for transportation, housing, the economy, and the environment

ABAG is responsible for conducting the **Regional Housing Needs Allocation (RHNA)** process for all Bay Area jurisdictions



*Credit: Karl Nielsen*

# What is the Regional Housing Needs Allocation (RHNA)?

RHNA is a state-mandated process **requiring every jurisdiction to plan for housing across all income levels** — with distinct roles for three levels of government.

Determines the **total number of units** the Bay Area must plan for, by income category, for each 8-year cycle

**State (HCD)**

Works with local governments and the public to develop a **methodology** for assigning each jurisdiction its share

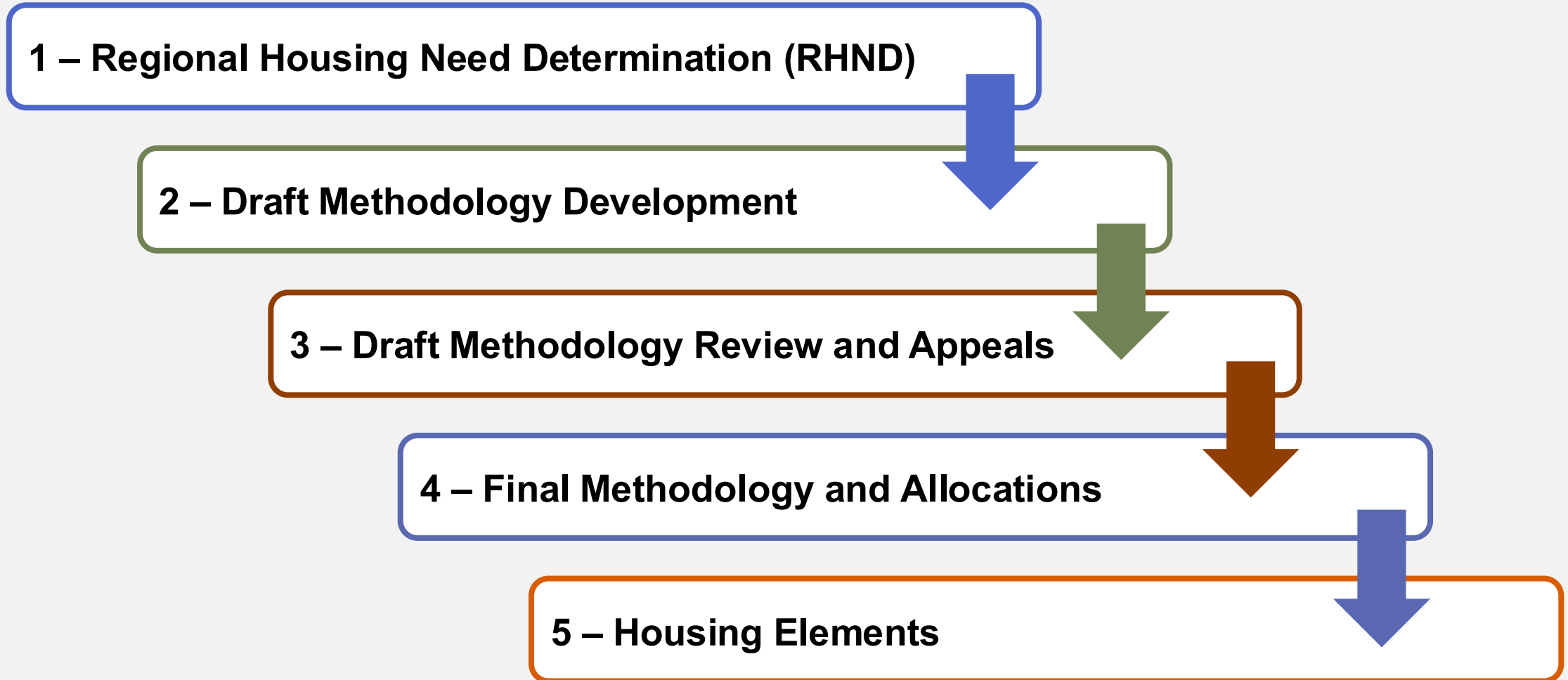
**ABAG**

Must update their **Housing Element** to show how they will plan to meet their assigned share

**Local Governments**



# RHNA Process and Requirements



# RHNA and the Housing Element Process

## Step 1: RHNA



ABAG allocates each jurisdiction a share of the regional housing need across four income categories

## Step 2: Housing Elements



Jurisdictions **identify sites and adopt policies to accommodate and support their RHNA** in the Housing Element Update

## Step 3: HCD Certification



HCD certifies or rejects the **Housing Element**; jurisdictions must revise until certified

# Looking Back to RHNA Cycle 6

*RHNA Cycle 6 covers 2023 through 2031; allocations were finalized in late 2021*

**441K**

units assigned to the Bay Area  
- the largest RHND to-date

**New requirements:**

expanded HCD oversight;  
emphasis on affirmatively  
furthering fair housing (AFFH)

**HCD scrutiny**

of Housing Elements; many  
jurisdictions required to revise

## ***Key Lessons from Cycle 6***

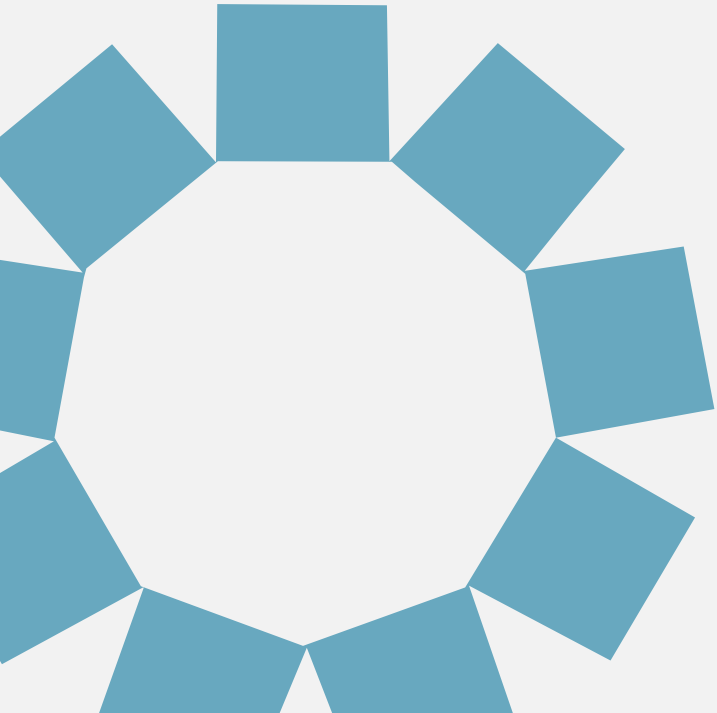
The Bay Area **has consistently underproduced** affordable units relative to RHNA targets

State enforcement and **HCD oversight have intensified** each cycle

Cycle 7 will build on Cycle 6 — **early planning is critical**

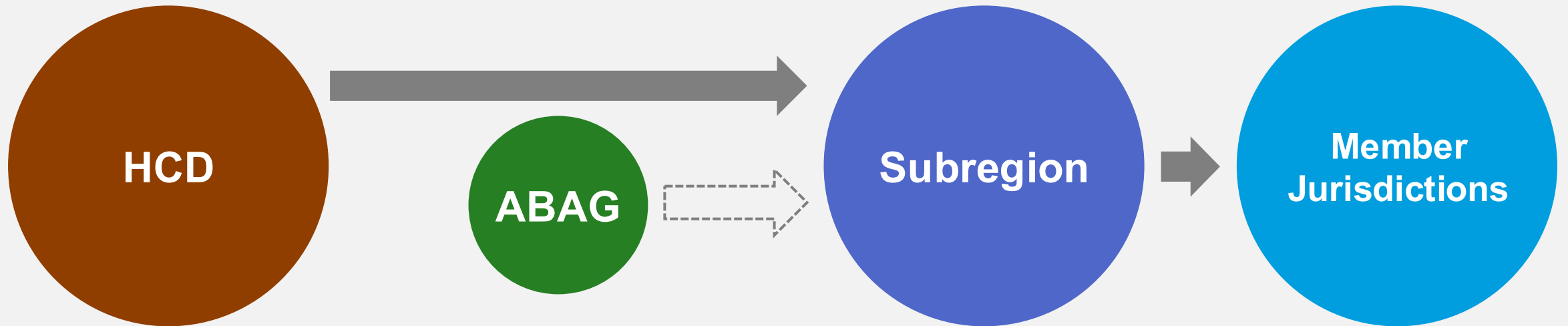


# Looking Ahead to Cycle 7: RHNA Subregions



# What is a RHNA Subregion?

A subregion must conduct its own RHNA process, independent of ABAG  
*It must carry out all requirements in Government Code Sections 65584.04 & 65584.05.*



A subregion receives a share of the region's total housing needs and must allocate a portion to each participating jurisdiction.

# An Exploratory Process – No Decisions Required Yet

## Where We Are Today

We are currently in a phase of **outreach and information sharing**

**No decisions or commitments are currently needed** from interested jurisdictions

## The Deadline

Subregions **must be formally established by early 2028** – approximately **two years** from now

## Purpose of This Presentation

Provide **information and answer questions**

Any decisions to form a subregion will come later on



# Benefits of a Subregion



Fosters  
**collaboration and  
new opportunities**  
for local jurisdiction  
**partnerships**



**Facilitates  
dialogue between  
jurisdictions and  
the public** on  
housing issues



Allows allocations  
that may be **more  
tailored to local  
context**



Promotes  
**alignment**  
**between local and  
regional needs**

# Challenges of a Subregion

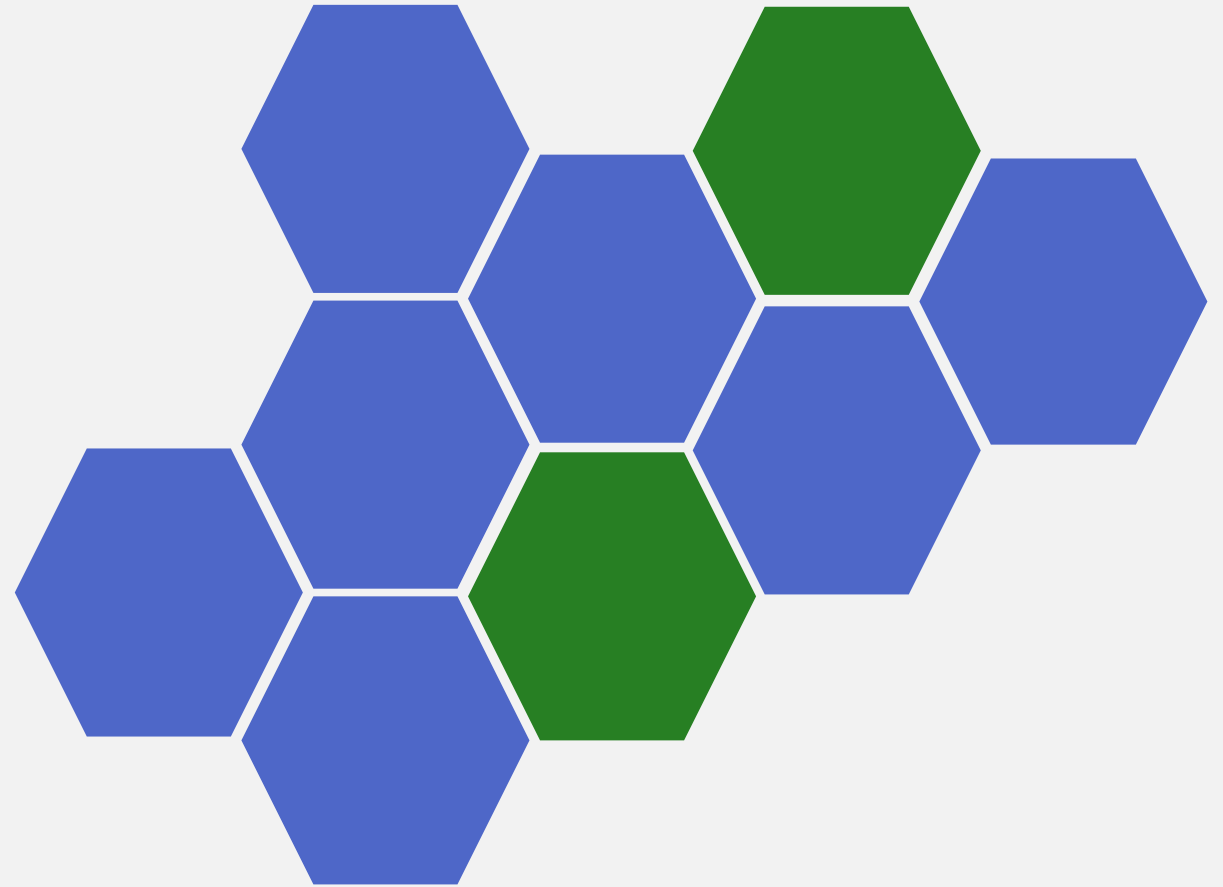
Subregional process is subject to *significant* scrutiny and oversight by HCD

Requires a **substantial** commitment of resources and staff time by subregion jurisdictions

Potential for **lack of compromise** among subregion jurisdictions

# Who Can Form a Subregion?

- By statute, a subregion *“may include a single county and each of the cities in that county or any other combination of geographically contiguous local governments.”*
- The subregion **must include the unincorporated county** as a member.
- A subregion *does not need to include all jurisdictions within a county;* however:
  - **Members must be geographically contiguous.**



# What Does a Subregion Have to Do?

- 1 Develop proposed allocation methodology and conduct public hearing
- 2 Publish draft allocation methodology
- 3 Submit methodology to HCD (HCD must confirm it furthers statutory objectives)
- 4 Adopt methodology and issue draft allocations
- 5 Receive appeals and public comments on appeals
- 6 Conduct public hearing on appeals, issue final determinations
- 7 Conduct public hearing and adopt final allocation plan

*If the subregion cannot complete the allocation, ABAG must make allocations to subregion members.*

# Summary of Statutory Objectives

*See Government Code Section 65584(d) for full statutory language*

**1 - Increase housing supply, mix of housing types, affordability, and equity**

**2 - Promote infill development, efficient growth patterns, and greenhouse gas reduction**

**3 - Improve the jobs-to-housing balance, particularly for low-wage workers**

**4 - Address disproportionate income distributions across jurisdictions**

**5 - Affirmatively further fair housing**



# How RHNA Has Changed This Cycle

## *Notable Changes*

- **Unhoused Populations.** Allocations now include units for acutely low- and extremely low-income households.
- **Climate Considerations.** Allocation methodologies must consider climate-related factors, including wildfire risk, sea level rise, and evacuation capacity.
- **Expanded HCD Role.** HCD can review and require revisions to methodologies that do not further RHNA objectives.



*Credit: Karl Nielsen*



# Expected Timeline for Subregions



# How a Subregion is Formed



Each participating jurisdiction adopts a resolution approving participation.



The subregion identifies a lead or coordinating agency.



ABAG and the subregion execute a Memorandum of Understanding delegating RHNA responsibilities.

# How Subregions are Implemented Locally



Credit: Karl Nielsen

## ***Governance and coordination***

- Lead agency manages RHNA activities on behalf of the subregion.
- Prior cycles relied on existing regional bodies (e.g., transportation or county coordinating agencies).
- Subregions typically establish:
  - Technical Advisory Committee
  - Policy Advisory Committee
  - Governing Body responsible for statutory actions

# Time and Cost Expectations

## *Resource considerations*

- Approximately **18 months to complete** the RHNA process, plus 2–6 months for formation.
- Prior subregions spent **up to \$200,000 on staff and consultant support.**
- **Costs may be higher** in this cycle due to **increased HCD oversight.**

# Past Bay Area Subregions

**2007 – 2014  
cycle**

**San Mateo County**

**2015 – 2023  
cycle**

**Napa County  
San Mateo County  
Solano County**

**2023 – 2031  
cycle**

**Solano County**



# Key Takeaways

The process is structured, time-intensive, and subject to HCD oversight

Subregions offer flexibility and collaboration, but require capacity and coordination

Early planning and clear governance are critical to success