

## Overview of RHNA Subregions

Compiled by ABAG/MTC Staff – June 2026

### What is a RHNA subregion?

A subregion receives a share of the region’s total housing needs and must allocate a portion to each participating jurisdiction. Creating a subregion provides an opportunity for local governments to exercise greater control over the housing allocation process and provides expanded opportunities for collaboration.

#### *Benefits*

- Fosters collaboration among jurisdictions and creates new opportunities for partnerships
- Facilitates dialogue between jurisdictions and the public on housing issues
- Allows potential for allocations that are more tailored to the local context, as well as greater coordination of local housing policy implementation
- Promotes better alignment between local and regional needs

#### *Challenges*

- Subregional process subject to significant scrutiny and oversight by HCD
- Requires significant commitment of resources and staff time by subregion’s jurisdictions
- Potential for lack of compromise amongst 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.”<sup>1</sup> The subregion must include the unincorporated county as a member. It does not need to include all jurisdictions within the county, but the subregion members must be geographically contiguous.

### What must a subregion do?

The subregion must carry out all requirements in Government Code Sections 65584.04 & 65584.05 to allocate its share of the region’s housing need to its members. If the subregion fails to complete the allocation, ABAG must make allocations to subregion members. Major tasks include:

- Develop a draft allocation methodology, to be submitted to HCD for review and comment
- Adopt a final method and issue a draft allocation by income category that maintains the subregion’s total housing need
- Conduct the process by which allocations can be appealed
- Prepare and adopt the final allocation plan, including conducting required public hearings

By statute, the subregion’s final allocation must further the following objectives:

1. Increase housing supply and mix of housing types, with the goal of improving housing affordability and equity in all cities and counties within the region.
2. Promote infill development and socioeconomic equity; protect environmental and agricultural resources; encourage efficient development patterns; and achieve greenhouse gas reduction targets.
3. Improve intra-regional jobs-to-housing relationship, including the balance between low-wage jobs and affordable housing units for low-wage workers in each jurisdiction.
4. Balance disproportionate household income distributions (more high-income allocation to lower-income areas, and vice-versa)
5. Affirmatively further fair housing.

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<sup>1</sup> California Government Code Section 65584.03

### **What is the expected timeline for the subregion process?**

Subregions must form by early 2028,<sup>2</sup> at which time ABAG will provide the subregion's housing need determination. The subregion must complete final allocations by the end of 2029.

### **Where have subregions been formed in past RHNA cycles?**

There was one (San Mateo County) in the 2007-2014 cycle, three (Napa County, San Mateo County, and Solano County) in the 2015-2023 cycle, and one (Solano County) in the 2023-2031 cycle.

### **How has the RHNA process changed from previous cycles?**

Major changes include:

- **Planning for the housing needs of additional household income levels:** As a result of recent legislation, the subregional final RHNA plan must now include an allocation of units for acutely low- and extremely low-income households.<sup>3</sup>
- **New factors to be considered for the allocation methodology:** Emergency evacuation route capacity, wildfire risk, sea level rise, and other impacts caused by climate change.
- **Greater HCD oversight:** If HCD determines the proposed allocation methodology does not further the RHNA objectives, the subregion must work with HCD to revise the methodology and receive HCD's acceptance that the revised methodology furthers the objectives.
- **Subregion allocation:** The allocation to a subregion must now be in the same proportion as the subregion's share of the adopted RHNA plan from the previous cycle.

### **What is the process for forming a subregion?**

1. **Obtain local commitment:** Each jurisdiction must adopt a resolution approving its participation in the subregion. ABAG must adopt a resolution acknowledging the subregion.
2. **Identify coordinating agency:** The subregion must identify a lead agency to which ABAG can delegate the authority for conducting RHNA. This usually consists of an existing institutional body that convenes multiple jurisdictions.
3. **Sign a Memorandum of Understanding (MOU) with ABAG:** The MOU outlines the process, timing, and other terms and conditions for ABAG's delegation of responsibility to a subregion.

### **How is a subregion implemented locally?**

The subregion's lead agency manages completion of the RHNA process. In previous cycles, lead agencies were Napa Valley Transportation Authority, Solano City County Coordinating Council, and City/County Association of Governments of San Mateo County. Starting a subregion without an existing institutional entity is possible, but it would likely require more planning and coordination.

Lead agencies have typically established committees with representation from each member jurisdiction to carry out the following roles:

- A Technical Advisory Committee to make recommendations related to the methodology.
- A Policy Advisory Committee made up of elected officials to review the work of the TAC and develop policy recommendations for consideration by the Governing Body.
- Governing Body to provide policy direction and take all actions required to fulfill the statutory obligations of the subregion.

### **How much time does the subregional process take? How much does it cost?**

Completion of the RHNA plan takes approximately 18 months, with an additional 2 to 6 months prior to designation to obtain resolutions from participating jurisdictions. In previous cycles, subregions have spent between \$50,000-\$200,000 for staff time and consultant support; however, funding requirements may be greater for Cycle 7 given increased oversight by HCD.

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<sup>2</sup> Housing Element Law requires subregions to form by September 30, 2028. Due to the requirements involved in forming subregions, consistent with previous cycles, subregions are encouraged to form in early 2028.

<sup>3</sup> California Government Code Section 65584(d)(1)