
POLICY PRIMER

A Brief Overview: RHNA and Housing Elements

And what to make of a 2.5 million unit mandate

WAKE UP CALIFORNIA

Amy Kalish · May 4, 2026

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WHERE IT STARTED

RHNA Housing Cycles

Regional Housing Needs Assessment

Pronounced "REE-nuh." The state's housing target system.

ORIGIN

1969

California has had RHNA since 1969

PURPOSE

Plan

Designed to give cities an idea of what to plan for

ENFORCEMENT

Guide

Had no enforcement mechanism — used as a guideline

Where Does RHNA Come From?

California Department of **Housing and Community Development**

Creates RHNA targets

Coalitions Of Governments

Regional bodies (e.g., ABAG for the Bay Area)

HCD *creates the number*

Using census data + population and jobs projections from the CA Dept. of Finance

HCD *splits by region*

Distributes the statewide number to each Coalition of Governments (COG)

The COGs *assign to localities*

Each COG distributes its share to cities and counties in its jurisdiction

The Housing Accountability Act

Purpose

Enacted in 1982 to address the housing crisis by preventing local government obstruction /delays and curbing the arbitrary denial of housing projects.

Objective Standards Only

Local agencies cannot reject projects based on subjective criteria like "neighborhood character." They must use written, objective standards.

Approval Requirement

If a project complies with all objective General Plan and zoning standards, the government must approve it.

Limitation on Reductions

A project's density cannot be reduced below the allowed level unless necessary to comply with safety standards.

What “Quick Approvals” Cost

Fast-tracking approvals requires eliminating “inhibitors to housing.” The state's path identifies three:

Local Input

OUR VOICES: Public hearings, community comment, planning commission discretion

Planning & Zoning

LOCAL CONTROL: General Plan review, site-specific zoning standards, density limits

CEQA & Impact Studies

IMPACTS CAN'T BE USED FOR MITIGATION NEGOTIATION: environmental review, fire risk, evacuation capacity, traffic and water analysis

THE INFLECTION POINT

The 6th Cycle Changed Everything

WHAT CHANGED

~2.5 million units

Statewide target jumped to a historically unprecedented number

Became enforceable

RHNA carried legal consequences for the first time

New compliance burden

Reporting and tracking requirements added

Many cities saw housing targets increase **10× to 20×** in a single cycle.

EXAMPLE · MARIN COUNTY

TOTAL RHNA

2,298 → 14,405

UNINCORPORATED MARIN

185 → 3,569

Nearly 20× increase

Cities were required to plan for these increases regardless of local constraints.

6th Cycle • Marin County

Table H-4.1: Regional Needs Housing Allocation, 2023-2031 Planning Period

Jurisdiction	RHNA Units Needed By Income Category				2023-2031	2015-2023
	Very Low (0-50% AMI)†	Low (51-80% AMI)	Moderate (81-120% AMI)	Above Moderate (120%+ AMI)		
Belvedere	49	28	23	60	160	16
Corte Madera	213	123	108	281	725	72
Fairfax	149	86	71	184	490	61
Larkspur	291	168	145	375	979	132
Mill Valley	262	151	126	326	865	129
Novato	570	328	332	860	2,090	415
Ross	34	20	16	41	111	18
San Anselmo	253	145	121	314	833	106
San Rafael	857	492	521	1,350	3,220	1,007
Sausalito	200	115	114	295	724	79
Tiburon	193	110	93	243	639	78
Unincorporated	1,100	634	512	1,323	3,569	185
TOTAL	4,171	2,400	2,182	5,652	14,405	2,298

TOTAL UNITS

2,298 → 14,405

Over 6x increase

WHERE THE GROWTH WENT

Above Moderate

5,652 of 14,405 units — the largest single category by far.

39%

Cities must plan for all income levels — but the majority of units are still in higher-income categories.

Appeals Were Allowed — But Didn't Change Outcomes

WHAT HAPPENED

Cities appealed RHNA numbers

Based on “changed circumstances”

Appeals cited real constraints

Wildfire risk, evacuation limits, infrastructure gaps, environmental conditions

Reviewed by regional agencies (COGs)

Each appeal heard at the regional level

All appeals denied

No adjustment to assigned targets

KEY FINDING

There was no adjustment to RHNA targets, even when conditions materially changed.

LOOKING FORWARD

The next RHNA cycle will not allow appeals.

The Housing Element

1 Site the Units

In four income categories — with a buffer above the RHNA number. Very specific category targets must be sited

2 Safety Element

Address fire, flood, evacuation, and other hazards — but not use the report to inhibit housing

3 Environmental Impact Report

Full EIR for the housing element, but not use specific and unavoidable impacts to limit housing.

4 Demographics & Statistics

Detailed documentation of population and need, with required language describing the housing crisis as a crisis at all levels.

5 AFFH Plan

Affirmatively Furthering Fair Housing — a federally rooted plan now used to densify “opportunity zones” with very low and low income units, regardless of economic factors.

6 Upzone & Update General Plan

Rezone and upzone, even in hazards and environmentally sensitive areas; update the General Plan to match. Careful upzoning later subject to density bonus law.

THE COST

Expensive. Time-Consuming. Unfunded.

**\$10
MILLION**

spent in Marin County alone — on consultants writing housing elements. No tally of staff and in-house legal.

None of it went to building actual housing.

WHAT IT REQUIRED

- Unfunded mandate — no state money for housing element work
- New requirements forced cities to bring in outside consultants
- In hazard areas, tough decisions were made
- Long HCD turnaround for review
- Most localities missed their deadlines
- Guidance from HCD was vague

THE STATE AUDITOR FOUND

The 2.5M Number Failed an Audit

BEFORE THE PANDEMIC

The 2.5M-unit requirement was already not in line with projected population growth.

THE AUDIT FOUND

Numbers were not reliable or reproducible. The methodology was opaque. "HCD risked losing public confidence..."

THE RESPONSE

The audit was ignored. The 2.5M wasn't adjusted. The Bay Area got 441,000 units.

DESPITE THE EVIDENCE

RHNA Is Unsubstantiated

AFTER THE AUDIT

HCD didn't change the numbers.

The State Auditor's findings — that the methodology was opaque and unreliable — went unanswered.

AFTER THE DOF PROJECTIONS DROPPED

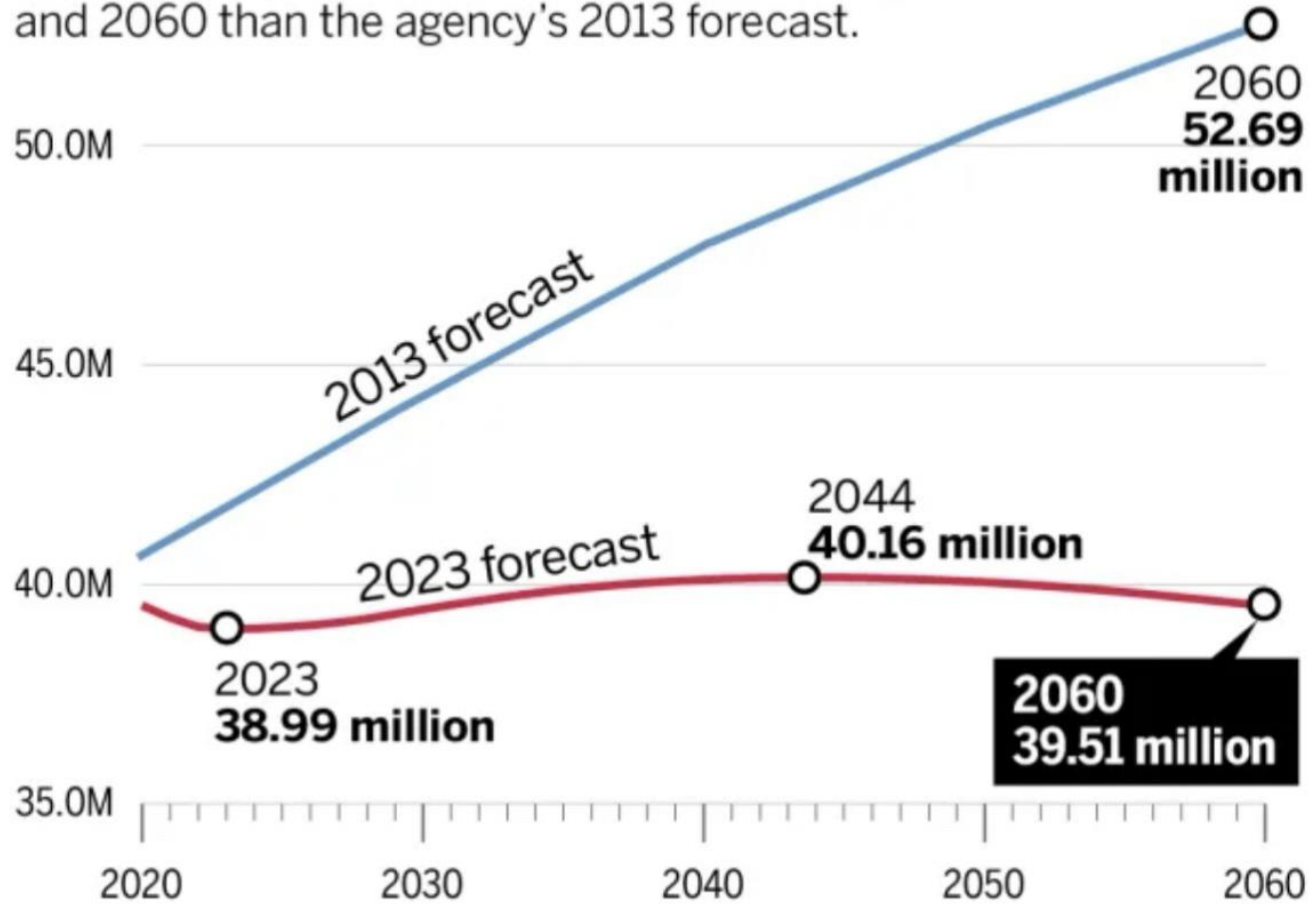
HCD didn't change the numbers.

Even after the Department of Finance dramatically lowered its long-term population forecast, the 2.5M unit mandate remained untouched.

Published and Forgotten

CALIFORNIA POPULATION GROWTH TO SLOW

The state finance department's latest population estimate projects much flatter growth between now and 2060 than the agency's 2013 forecast.



Source: Calif. Dept. of Finance

BAY AREA NEWS GROUP

What This Means

Land use control was transferred

From communities, planning commissions, and local governments — to a for-profit industry.

The mix is unbalanced

85% market-rate housing vs. 15% across all lower-income categories.

Cities are judged by developers' actions

HCD doesn't count approvals — only permits pulled, an action a developer takes when ready to build.

Cities face constant exposure

Lawsuits and "punishment" projects: Builder's Remedy, SB 35, SB 423.

Affordability isn't being touched

The crisis the system claims to address isn't actually being solved.

Housing Development Pipeline



Housing Element Implementation and APR Data Dashboard



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User Guide

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County

Jurisdiction

COG/Region

Year

Structure Type

Tenure

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All

All

All

2024

All

All

Housing Development Pipeline

*Very Low Income Units Include Extremely Low Income Units



*“If the state's own auditor said the numbers aren't reliable—
and the state's own DOF said the estimates were way off...*

***why are cities still being
punished for missing them?”***

LEARN MORE · GET INVOLVED

Wake Up California

501(c)(4) working for rational housing policy in California

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