



Inventory of Sites in the **Housing Element**

The inventory of sites contained in the Housing Element is a critical component of the plan, since adequate sites are necessary to allow housing development that will ease the housing crisis. There are many existing resources to guide creation, evaluation and research into the sites inventory. This toolkit is designed to give a brief overview of the sites requirements and process in Housing Element Law, and the resources available to engage in the inventory of sites in the communities where you live and work.

- The Public Interest Law Project (PILP) publishes the [California Housing Element Manual](#) that describes the entire process of adopting the Housing Element, laws governing the process, and contents required.
- The California Department of Housing and Community Development (HCD) published a [Housing Element Sites Inventory Guidebook](#) in June 2020 that describes the details of the sites requirements.
- HCD also has a shorter version of the sites obligations in its [Building Blocks](#) and [webinars](#) on its website.
- HCD also has [Open Data Tools](#), including a [Site Check Tool](#) which can be used to help evaluate the adequacy of the sites and a Tax Credit Allocation Committee (TCAC)/HCD [Opportunity Map](#) that can be used to assess fair housing implications for the sites.

How many sites are needed? The Regional Housing Needs Allocation process.

The Housing Element revision process begins with a determination by the California Department of Housing and Community Development (HCD) of the projected need over

the planning period, known as the Regional Housing Need Allocation (RHNA). The details of this process are described in Chapter II of PILP's [Housing Element Manual](#). The end result of the RHNA process determines what capacity of sites each city and county must identify in the Housing Element, with appropriate zoning and removing constraints to housing development. The inventory of sites must accommodate 100% of the RHNA, either through available sites with existing zoning, or if there are not enough sites, then the Housing Element must include a program to rezone sites.

Does the jurisdiction have a carryover RHNA from the previous planning period?

In addition to the RHNA allocated for the current 6th Cycle Housing Element period, the local government may be required to rezone sites if it did not complete rezoning that was required during the 5th Cycle. You can check to see if there was a rezone program in the 5th Cycle Housing Element by locating a copy either on the website of the local jurisdiction, or HCD's [Housing Element Search Tool](#). This obligation should also be noted in the programs section of the Annual Progress Reports (APR), which can be found on HCD's [APR Dashboard](#) — see page 14. If there was a rezone obligation in the 5th Cycle, the local government would need to take action by the governing body — City Council or Board of Supervisors — which should be posted in the minutes of the meetings for that body, and may be reflected in amendments to the municipal code. The rezone obligation may also be found in [HCD's review letters](#) for the 5th Cycle, since the rezone obligation may be a condition of compliance with state law.

Where should sites be located (or not located)?

Those with local knowledge about areas of opportunity in the jurisdiction are best situated to evaluate where sites should be located. If possible, it is best for advocates to **partner with a non-profit developer** that has experience with development in that jurisdiction. Consider factors such as: whether sites are located in areas

that are gentrifying, what kind of new investment is needed and where, and whether there are environmental justice concerns associated with the location of sites. Sites must be located in areas that will Affirmatively Further Fair Housing (AFFH), which is explained further in [HCD's guidance](#) on the AFFH requirement, which also includes an [AFFH mapping tool](#).

Credits

This toolkit reflects the work of a Bay Area Housing Element advocacy working group that includes (in alphabetical order): East Bay Housing Organizations, Enterprise Community Partners, GENESIS, Greenbelt Alliance, The Housing Leadership Council of San Mateo County, The Law Foundation of Silicon Valley, The Nonprofit Housing Association of Northern California, Public Advocates, Public Interest Law Project, RichmondLAND, Urban Habitat, and Working Partnerships USA.