

Date of Hearing: April 22, 2026

ASSEMBLY COMMITTEE ON LOCAL GOVERNMENT

Juan Carrillo, Chair

AB 2351 (Bonta) – As Amended April 6, 2026

SUBJECT: General plan: annual report: shelter beds

SUMMARY: Requires local jurisdictions to report the number of emergency shelter beds and permanent housing units in the jurisdiction in the annual progress report (APR). Specifically, **this bill:**

- 1) Requires, for purposes of the APR, planning agencies to report the number of emergency shelter beds and the number of permanent housing units serving those experiencing or exiting homelessness in the jurisdiction in each of the following categories:
 - a) Noncongregate shelter beds, which are facilities that offer temporary shelter or lodging for people experiencing or exiting homelessness, including but not limited to, interim beds in tiny homes, motels, hotels, or navigation centers.
 - b) Transitional housing, which is housing that provides temporary lodging and is designed to facilitate the movement of individuals and families experiencing or exiting homelessness into permanent housing within a specified period of time, but no longer than 24 months.
 - c) Permanent supportive housing, which is housing that offers permanent housing and supportive services to assist people experiencing or exiting homelessness with a disability to live independently, including, but not limited to, individuals with disabilities or families in which one adult or child has a disability.
 - d) Rapid rehousing, which is permanent housing that provides housing relocation and stabilization services or short- or medium-term rental assistance as necessary to help an individual or family experiencing or exiting homelessness move as quickly as possible into permanent housing and achieve stability in that housing.
 - e) Other permanent housing, which is long-term housing that is not otherwise considered permanent supportive housing or rapid rehousing.
- 2) Provides that, if the Commission on State Mandates determines that this bill contains costs mandated by the state, reimbursement to local agencies and school districts for those costs shall be made pursuant to current law governing state mandated local costs.

EXISTING LAW:

- 1) Defines “permanent supportive housing” as a project that offers permanent housing and supportive services to assist people experiencing homelessness with a disability to live independently, including individuals with disabilities or families in which one adult or child has a disability, in alignment with 24 Code of Federal Regulation (CFR) Part 578.3.

- 2) Defines “rapid rehousing,” as a permanent housing project that provides housing relocation and stabilization services and/or short- and/or medium-term rental assistance as necessary to help an individual or family experiencing homelessness move as quickly as possible into permanent housing and achieve stability in that housing. (24 CFR Part 578.3)
- 3) Defines “shelter,” to include interim beds in tiny homes, motels and hotels, as defined as projects that offer temporary shelter (lodging) for people experiencing homelessness in general or for specific populations of people experiencing homelessness.(24 CFR Part 576.2)
- 4) Defines “transitional housing,” as a project that provides temporary lodging and is designed to facilitate the movement of individuals and families experiencing homelessness into permanent housing within a specified period of time, but no longer than 24 months. (24 CFR Part 578.3)
- 5) Requires a planning agency to provide an APR to the legislative body, the Governor’s Office of Land Use and Climate Innovation, and the Department of Housing and Community Development (HCD) by April 1 of each year that includes all of the following:
 - a) The status of the general plan and progress in its implementation.
 - b) The progress in meeting its share of the regional housing needs allocation (RHNA), including the need for extremely low-income households, and local efforts to remove governmental constraints to the maintenance, improvement, and development of housing included in the housing element.
 - c) The number of housing development applications received in the prior year, including whether each housing development application is subject to a ministerial or discretionary approval process.
 - d) The number of units included in all development applications in the prior year.
 - e) The number of units approved and disapproved in the prior year, disaggregated into income subcategories within opportunity areas, as specified.
 - f) The degree to which the approved general plan complies with the guidelines developed in existing law for addressing specified matters, including environmental justice matters, collaborative land use planning of adjacent civilian and military lands, consultation with Native American tribes, and road and highway safety.
 - g) A listing of sites rezoned to accommodate that portion of the city or county’s share of the RHNA for each income level that could not be accommodated on sites identified in the housing element’s site inventory and any sites that may have been required to be identified under the No Net Loss Zoning law.
 - h) The number of housing units demolished and new units of housing, including both rental housing and for-sale housing, that have been issued a completed entitlement, a building permit, or a certificate of occupancy, thus far in the housing element cycle, and the income category by AMI that each housing unit satisfies.

- i) Certain information regarding funding that may have been allocated via the Local Government Planning Support Grants Program.
 - j) The progress of the city or county in adopting or amending its general plan or local open-space element in compliance with its obligations to consult with California Native American tribes and to identify and protect, preserve, and mitigate impacts to tribal places, features, and objects.
 - k) Specified information related to density bonus law applications, including the number of units in a student housing development for lower income students for which the developer was granted a student housing density bonus.
 - l) Specified information related to Affordable Housing and High Road Jobs Act of 2022 applications.
 - m) A list of all historic designations listed on the National Register of Historic Places, the California Register of Historic Resources, or a local register of historic places by the city or county in the past year, and the status of any housing development projects proposed for the new historic designations.
 - n) Specified information related to housing development project on land owned by religious institutions or independent institutions of higher education.
 - o) A report on the demolition of housing units for any reason, as specified.
 - p) A report on replacement housing units requires pursuant to local, state, or federal law for approved development project that are not housing development projects.
[Government Code (GOV) § 65400]
- 6) Requires HCD to post APRs on its website within a reasonable time of receiving the reports.
(GOV § 65400)

FISCAL EFFECT: The bill is keyed fiscal and contains a state-mandated local program.

COMMENTS:

- 1) **Bill Summary and Author’s Statement.** This bill requires cities and counties to report the number of emergency shelter beds and permanent housing units in the jurisdiction in specified categories in the APRs they provide to HCD. This bill is sponsored by Dignity Moves and Bay Area Council.

According to the author, “Addressing the homelessness crisis is a top priority for countless Californians, including many in this legislature, yet we still lack basic data transparency to track how we are addressing it as a state. AB 2351 takes a simple but critical step: requiring local governments to report the number of shelter beds and housing units serving people experiencing or exiting homelessness as part of their existing annual progress reports to the state. This data is already largely tracked. This bill simply ensures it flows to the state so that we can build a complete, statewide picture of our shelter capacity and better coordinate our response.

“California has made real progress, including a 9% drop in unsheltered homelessness in 2025, but that progress has been uneven across jurisdictions. This bill gives the state the tools to identify which communities are stepping up and which are falling behind. By leveraging the Annual Progress Report process that cities and counties already complete each year, AB 2351 imposes minimal new administrative burden while delivering maximum accountability. Transparent, standardized data is the foundation of an effective, equitable homelessness response.”

- 2) **Adoption and Implementation of Housing Elements.** One of California’s key tools for addressing the housing crisis is requiring all 539 cities and counties to plan for their current and future housing needs. This is done through the Housing Element—a mandatory component of each jurisdiction’s general plan—which provides a long-term strategy to meet projected housing demand across all income levels. Most jurisdictions in high-population areas must update their Housing Elements every eight years, while those in smaller-population regions must update every five years. We are currently in the 6th Housing Element Cycle (2021–2029), with the 7th Cycle (2029–2037) on the horizon.

A critical part of each Housing Element is showing how a jurisdiction will accommodate its share of the RHNA. RHNA figures are based on the RHND, which HCD establishes using demographic and housing data—developed in consultation with DOF and each region’s COG. The RHND identifies the total housing need for a region, which the COG then distributes to local governments via RHNA. Housing allocations are divided into four income categories: very low-income [0-50% of Area Median Income (AMI)], low-income (50-80% of AMI), moderate income (80-120% of AMI), and above moderate income (120% or more of AMI). Each city or county must demonstrate, through its Housing Element, how it will zone for its assigned housing units at each income level, while also addressing fair housing and special needs populations.

- 3) **RHND/RHNA Methodology.** Each Housing Cycle begins with HCD and DOF projecting future housing needs. DOF provides population forecasts, while COGs contribute their own regional data as part of their Regional Transportation Plan (RTP) forecasts. At least 26 months before a housing element is due, HCD meets with each COG to discuss the methodology and assumptions for the upcoming RHND. COGs submit detailed regional data on factors such as household growth, household size trends, overcrowding, vacancy rates, cost burdens, and the jobs-housing balance. HCD can incorporate these inputs into its methodology or reject them if they conflict with other data or statutory requirements.

Following this consultation, HCD issues its final RHND for the region. The COG must then develop a RHNA methodology that fairly distributes the total housing need among its member jurisdictions. By law, the RHNA methodology must support several goals, including increasing housing supply across income levels, promoting infill development and equity, improving the jobs-housing balance (especially for low-wage workers), adjusting allocations where there are income concentration disparities, and affirmatively furthering fair housing.

- 4) **Annual Plan Report (APR).** Current law requires all local jurisdictions to provide housing information annually to HCD via the APR, including the following information from the current housing element cycle:

- a) The number of housing development applications received, and whether those applications are subject to ministerial or discretionary approval.
- b) The number of units included in all development applications.
- c) The number of units approved and disapproved.
- d) A listing of sites rezoned to meet the regional housing need for each income level.
- e) For each income category, the number of net (inclusive of demolished) new units of housing, including both rental housing and for-sale housing, that have been issued a completed entitlement, a building permit, or a certificate of occupancy.
- f) The number of density bonus applications received and applications approved by the city or county. Additionally, data from all projects approved to receive a density bonus from the city or county, including the number of other incentives or concessions granted to the project, and any waiver or reduction of parking standards.
- g) A unique site identifier, such as an assessor's parcel number (APN), for each entitlement, building permit, or certificate of occupancy.
- h) A list of all historic designations listed on the National Register of Historic Places, the California Register of Historical Resources, or a local register of historic places by the city or county in the past year.
- i) Information on housing development projects on land owned by religious institutions or independent institutions of higher education.
- j) The total number of units demolished, data on the type of units demolished, and a description of any relocation assistance provided to displaced occupants.
- k) A report on housing units to replace units that were demolished for approved development projects that are not housing developments.
- l) The overall progress in meeting its share of RHNA.

It is important to note that APR submission has become a lengthy and involved process for city and county planning staff to undertake each year, and changing components can also prompt HCD to need to reconfigure its existing APR data collection and visualization tools to account for different categories of information. Adding new components to APRs should be considered carefully in light of the additional workload that will be placed on planning staff or consultants as well as HCD.

- 5) **The Point-in-Time (PIT) and Housing Inventory Count (HIC).** The PIT is a count of sheltered and unsheltered people experiencing homelessness on a single night in January. HUD requires that Continuums of Care (CoCs) conduct an annual count of people experiencing homelessness who are sheltered in emergency shelter, transitional housing, and Safe Havens on a single night. CoCs also must conduct a count of unsheltered people experiencing homelessness every other year (odd-numbered years). Each count is planned,

coordinated, and carried out locally.

The HIC is a point-in-time inventory of provider programs within a CoC that provide beds and units dedicated to serving people experiencing homelessness (and, for permanent housing projects, where homeless at entry, per the HUD homeless definition), categorized by five Program Types: Emergency Shelter; Transitional Housing; Rapid Re-housing; Safe Haven; and Permanent Supportive Housing. Data for the PIT count and HIC are submitted to HUD via the online data submission Homelessness Data Exchange (HDX). The definitions of emergency shelter and permanent housing are almost identical to the federal definitions in the HIC, which should make it easier for local jurisdictions to report data as part of the APR.

- 6) **Policy Considerations.** This bill requires cities and counties to report the number of emergency shelter beds and permanent housing units in the jurisdiction. The Legislative Counsel Digest states that local agencies must meet this requirement beginning April 1, 2028. However, the language of the bill does not specify that the requirement begins April 1, 2028. The Committee may wish to consider clarifying that the requirements of this bill begin April 1, 2028.
- 7) **Committee Amendments.** The Committee may wish to consider amending the bill to clarify that its requirement begin April 1, 2028.
- 8) **Related Legislation.** AB 1567 (Ta) authorizes a local planning agency to include in its APR the number of units approved for congregate housing for the elderly. This bill is pending in this Committee.
- 9) **Arguments in Support.** The Bay Area Council, a co-sponsor of the bill, writes in support, “Although California has made strides in homelessness response and data collection, much of the available data remains siloed or inaccessible. The lack of sufficient data in homelessness response has repeatedly been raised in state and local audits. Complete local shelter bed data will ensure the state has the metrics to engage in statewide coordination and tackle California’s homelessness crisis.

“Current law already requires that all local governments adopt housing plans as part of their general plans. The bill adds the number of shelter beds as a required reporting element for annual progress reports. This will impose minimal new burden by allowing cities to report pre-existing data through a state-level process that they already complete each year. This valuable addition to APRs will help illuminate which cities are leading with the most effective approaches and refine the state’s response in helping Californians off the streets.”
- 10) **Arguments in Opposition.** None on file.
- 11) **Double-Referral.** This bill is double-referred to the Assembly Housing and Community Development Committee, where it passed on 11-0 vote on April 15, 2026.

REGISTERED SUPPORT / OPPOSITION:

Support

Bay Area Council- **CO-SPONSOR**
DignityMoves (UNREG)- **CO-SPONSOR**

California Yimby
National Alliance to End Homelessness
National Association of Minority Contractors Northern California

Opposition

None

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