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TO: Gubernatorial and Legislative Candidates

SUBJECT: RHNA: A Proposal for a Smarter, More Effective Housing Framework

The South Bay Cities Council of Governments (SBCCOG) maintains a legislative agenda which we share with our state representatives quarterly. At the top of our 2026 agenda is the the State’s approach to addressing housing and a re-evaluation of RHNA. RHNA establishes the framework for the state/local relationship. After nearly six decades, RHNA deserves a thoughtful, evidence-based update: one that better serves the state’s housing goals while equipping local governments with the tools, resources, and flexibility needed to actually deliver results.

The SBCCOG and its member cities are committed partners in addressing California’s housing and affordability challenges. Residents of Los Angeles County voted to tax themselves to fund local housing production and preservation, and the SBCCOG has established a housing trust to deploy those funds as effectively as possible. We raise these concerns not to resist housing growth, but because we believe a modern state/local partnership will produce more affordable housing, more equitably distributed, with stronger community support.

The Regional Housing Needs Assessment (RHNA) is a 57 year old policy of state government one-size-fits-all direction which turns control over the local development pattern to a community of developers. Today, using data tools and models not previously available, local planners have the ability to surgically site housing construction, understand their infrastructure capability such as matching the density with an appropriate mobility strategy, and deploy a range of tools such as addressing vacancies and subsidizing rents, besides just having construction as the only strategy being required. Using all of these strategies would generally protect the interests of longtime residents and businesses who have earned the right to have a voice in quality of life decisions that clause confuses the sentence)

The most significant gap in the current RHNA framework is the absence of any meaningful evaluation of infrastructure capacity and resource allocation. Water availability, sewer system capacity, transportation networks, and other critical systems are not assessed as part of the RHNA process, yet they directly determine whether new housing can be successfully integrated into a community. The current RHNA model treats housing construction as the singular solution to affordability, a view that is increasingly at odds with data and on-the-ground realities. We do not want to wait for one or more of those systems to break down in order to realize that this is a recipe for disaster.

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LOCAL GOVERNMENTS IN ACTION

Carson El Segundo Gardena Hawthorne Hermosa Beach Inglewood Lawndale Lomita  
Manhattan Beach Palos Verdes Estates Rancho Palos Verdes Redondo Beach Rolling Hills  
Rolling Hills Estates Torrance Los Angeles District #15 Los Angeles County

The RHNA is a good example of the limits to central planning divorced from facts on the ground:

- The rents will not be affordable except for those few below market dwelling units that the community pays for by even higher densities than would otherwise occur due to the density bonus provision of the RHNA program. Data show development cost of a dwelling unit in the South Bay was estimated to be over \$650,000 before the shocks from tariffs, labor deportation, and now disruption to the energy supply.
- Congestion will worsen. The official remedy is that the new residents will use transit, walk and bike. The data show that this is not a realistic expectation. Using the LA Metro “Locus” data base, we know that the bicycle mode share in the South Bay is less than 1% and public transit mode share averages less than 3% across cities (transit peaks at around 7% in Inglewood). That means around 95% of those new residents will drive around mostly alone and in an internal combustion powered vehicle. These numbers are not a South Bay anomaly. Mode share is much lower than 10% in most areas of LA County which has more transit than most areas of the state.

We think that the gubernatorial and legislative elections are a good time to let people know that facts matter and working together and not through mandates from the state, we need to find strategies that allow everyone to have a chance for housing that they can afford without destroying the organic communities that have been established throughout the state.

A comprehensive approach must incorporate demand-side strategies along with housing production goals. Addressing affordability by including strategies to increase incomes in order to reduce the price-wage gap is essential and best handled at the local level.

Jurisdictions that can demonstrate, through documented analysis, that their assigned RHNA numbers are not achievable given existing built conditions, infrastructure constraints, or land availability should have a pathway to produce an alternative plan.

An alternative plan would not be a way to opt out of housing responsibility. Rather, it would require the jurisdiction to show how it will address its share of housing need through other demonstrable means, including affordability programs, vacancy conversion, infrastructure investments, or other strategies, while accounting for the real-world factors that make the standard RHNA allocation infeasible. This kind of structured flexibility would strengthen, not weaken, overall housing outcomes by creating accountability tied to realistic goals.

This type of updated approach should also incorporate performance metrics that actually measure what matters: progress toward affordability, not just units authorized. The current system lacks any systematic evaluation of whether RHNA allocations are achieving their intended goal of expanding access to affordable housing. Without feedback loops and performance accountability, policy improvement is impossible.

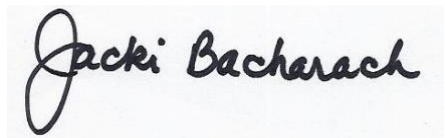
In closing, the SBCCOG’s legislative agenda for this election year will include a proposal for a new collaborative relationship between local and state jurisdictions. The outline of that proposal is that each sub-region (consisting of cities represented by a joint powers authority aka council of governments) and/or the County or metropolitan city would also commit to authorizing a number

of affordable dwelling units, grounded not in a one-size-fits-all allocation, but in a locally calibrated assessment of demographics, fiscal capacity, infrastructure readiness, mobility planning, and site suitability. Specifically, additional inputs would include:

1. A demographic assessment of California's present and future population needs;
2. The jurisdiction's fiscal capacity to subsidize affordable units;
3. Carrying capacity, including a documented evaluation of water, sewer, and other infrastructure systems;
4. A density plan paired with a data-driven mobility strategy that will effectively mitigate congestion caused by increasing housing supply; and
5. Site selection consistent with the principle of complete neighborhoods, prioritizing locations adjacent to dense clusters of essential destinations.

The SBCCOG looks forward to working with state leadership to develop a RHNA framework that is grounded in data, responsive to local conditions, and accountable for results. We welcome the opportunity for further dialogue and would be glad to discuss our vision in more detail, including our South Bay Sustainability Strategy, which aligns complete neighborhoods with complete streets and a full range of mobility options.

If you are interested in continuing this dialogue, we would welcome further discussion – possibly via zoom. We hope to hear from you.  
Sincerely,

A handwritten signature in black ink that reads "Jacki Bacharach". The signature is written in a cursive, flowing style.

Executive Director  
South Bay Cities Council of Governments