



April 6, 2016

Assembly Member Santiago
Room 5119
State Capitol
Sacramento, California 95814

SUBJECT: **OPPOSE UNLESS AMENDED - AB 2208 (SANTIAGO) – ADDING HOUSING ON TOP OF EXISTING BUILDINGS** – IN HOUSING AND COMMUNITY DEVELOPMENT COMMITTEE – APRIL 13TH

Dear Assembly Member Santiago:

The American Planning Association, California Chapter (APA California) must respectfully oppose your bill, AB 2208. AB 2208 would expand the Housing Element inventory of land suitable for residential development to include buildings owned or under the control of a city or a county, zoned for residential or nonresidential use and capable of having residential developments constructed above the existing building, and underutilized sites.

APA California does not object to the bill's requirement that the inventory of sites include a review of underutilized sites to determine if they are viable for housing development. It should be noted, though, that review may not result in any additional housing being built on those sites within the planning period depending on what the current use of the site is, what the owner's plans for the site are, and how soon the site might be available for development.

However, the requirement to assess the potential addition of housing on top of existing public facilities isn't viable. In order to add additional floors to an existing operating public facility, the facility must be built with the knowledge or potential for adding housing so that the structure below the housing meets code requirements to carry the weight and height of the added housing development.

While we appreciate your efforts to look at creative ways to create more housing, we must respectfully oppose this approach.

If you have any questions, please contact APA California's lobbyist, Lauren De Valencia with Stefan/George Associates, 916-443-5301 or lauren@stefangeorge.com.

Sincerely,

John Terell

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cc: The Governor, OPR, Housing and Community Development Committee, Republican Consultant

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