



American Planning Association  
**California Chapter**

*Creating Great Communities for All*

MEMO TO: SENATE HOUSING COMMITTEE

FROM: AMERICAN PLANNING ASSOCIATION, CALIFORNIA CHAPTER

DATE: JULY 16, 2020

SUBJECT: **NOTICE OF SUPPORT IF AMENDED – AB 3107 (Bloom) – Housing in Commercial Zones**

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The American Planning Association, California Chapter, has a support if amended position on AB 3107. AB 3107 mandates that a housing development in which at least 20% of the units have an affordable housing cost or affordable rent for lower-income households shall be an authorized use on a site designated in any element of the general plan for commercial uses. APA supports tools to allow more multifamily housing to be built, and appreciates the May 11 amendments including that the site of the housing development is not adjacent to any industrial use, it adjoins urban uses, and that the bill only applies until any necessary rezoning is required to identify needed adequate sites during this next round of housing element updates. APA however still has the following concerns and requested amendments:

1. “Commercial” is not defined. APA requests that the bill be limited to sites in urban infill areas that are zoned for office or retail in local zoning codes, not in “any element of the general plan”.
2. Requiring at least “20% of the units” to be affordable should be amended to specify that the 20% refers to 20% of the total units, including density bonus units. Otherwise, the total units will actually be about 15% of the project.
3. Instead of overriding local height, density, and floor area ratios with the standards specified in the bill, jurisdictions should be able to apply corresponding multifamily standards, including design standards, from the closest compatible multifamily or mixed-use zoning designation.

If you have any questions, please contact our lobbyist, Sande George, with Stefan/George Associates, [sgeorge@stefangeorge.com](mailto:sgeorge@stefangeorge.com), 916-443-5301.