The Honorable Richard Bloom  
California State Assembly, 50th District  
State Capitol, Room 2003  
Sacramento, CA 95814  

Re: AB 3107 (Bloom) Planning and zoning: commercial zoning: housing development  
City of Beverly Hills – OPPOSE

Dear Assemblymember Bloom,

The City of Beverly Hills stands in respectful OPPOSITION to AB 3107, your measure to make housing an authorized use on commercially zoned land. While the idea of repurposing underperforming commercial sites may have merit as a strategy to increase housing production, AB 3107 could very well result in a number of inappropriately located and sized housing development across the state.

Local jurisdictions invest an incredibly large amount of time and resources to develop their housing elements. This process includes deep analysis and large amounts of time gathering community input. Through this process, local jurisdictions take time to analyze and identify the most suitable locations for housing to meet their RHNA targets. This bill could lead to development on sites that would follow out-of-character zoning standards.

AB 3107 takes a one-size fits all approach, which fails to account for the wide variation in community characteristics across local jurisdictions. For instance, roughly 9 percent of the land in the City of Beverly Hills is zoned commercial, but these areas of the City generate 70 percent of the City’s revenue.

A “by-right” type approach could potentially impact the revenue of the City of Beverly Hills and lower the ability of the City to pay for vital public services such as police and fire. AB 3107 does not provide any additional resources or funding to cities in order to provide the infrastructure and additional city services that would be needed to support these new developments and the resulting increased populations.
Additionally, many jurisdictions create a graduated barrier from a busy commercial area to residential areas through adoption of a general plan. This bill would allow residential housing to be placed in a busy commercial area that could adversely affect the health of those living there. Given the major arteries that accommodate traffic flow into commercial areas, these new residents would be exposed to higher carcinogen producing exhaust fumes from the higher traffic counts that are typically not present in a residential area.

For these reasons, the City of Beverly Hills must respectfully OPPOSE AB 3107.

Sincerely,

Lester J. Friedman
Mayor, City of Beverly Hills

cc: Members and Consultants, Senate Housing Committee
    Members and Consultants, Senate Appropriations Committee
    The Honorable Ben Allen, 26th Senate District
    Andrew K. Antwih, Shaw Yoder Antwih Schmelzer & Lange