

EXHIBIT 8



July 15, 2021

Phillip S. Lanzafame
Director of Community Development
633 E. Broadway, Suite 103
Glendale, CA 91206

Re: Density Bonus Application
515 Pioneer Drive Affordable Housing Development
515 Pioneer Drive, Glendale, CA

Dear Mr. Lanzafame:

This letter was prepared in conjunction with the CEQA exemption and density bonus findings to address the merits of the request for waivers from development standards by identifying the significant impacts on the project if the Waivers are not granted. Without waivers of the below development standards, the construction of the affordable housing development would be physically precluded in the following ways.

Justification for approval of the waivers:

FAR

The request for additional FAR from 0.65 to 2.45 is directly tied to the density increase requested in order to realize the 340 units on the project site. It is not physically possible to expand the project from 39 units by right to 340 units with the density bonus without increasing FAR. The Glendale Municipal Code (GMC) allows 0.65 FAR in the R-3050 zone, which would allow a development with a total area of only 79,279 square feet. With approximately 11,281 square feet being used for community, office and service spaces, only 68,016 square feet would then be available for residential uses. At that size, the average dwelling unit size would be approximately 210 square feet. This average unit size would make it physically impossible for the 515 Pioneer Drive Project to provide one or two-bedroom units due to space constraints. This unit size would violate the unit sizes for one and two-bedroom units set by applicable funding sources such as the Tax Credit Allocation Committee (TCAC) (minimum unit sizes are 200 square feet for an efficiency, 450 square feet for a one-bedroom and 700 square feet for a two-bedroom). See exhibit 01 that graphically illustrates this hardship.

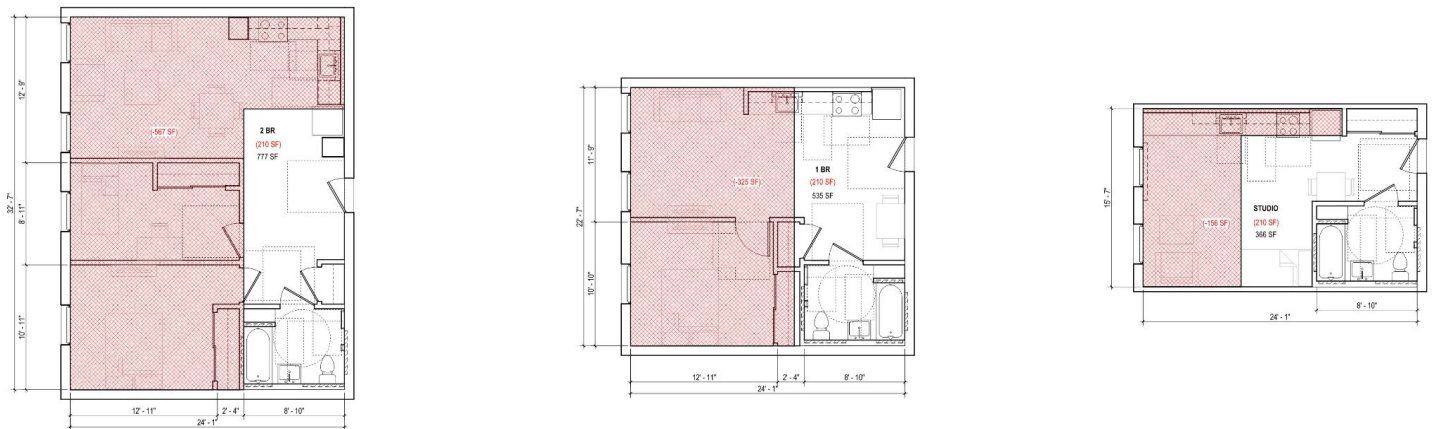
3573 Hayden Avenue
Culver City, California
90232

310-399-7975 phone

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Exhibit 01

Typical Units with overlay of reduced area if maintaining a FAR of 0.65

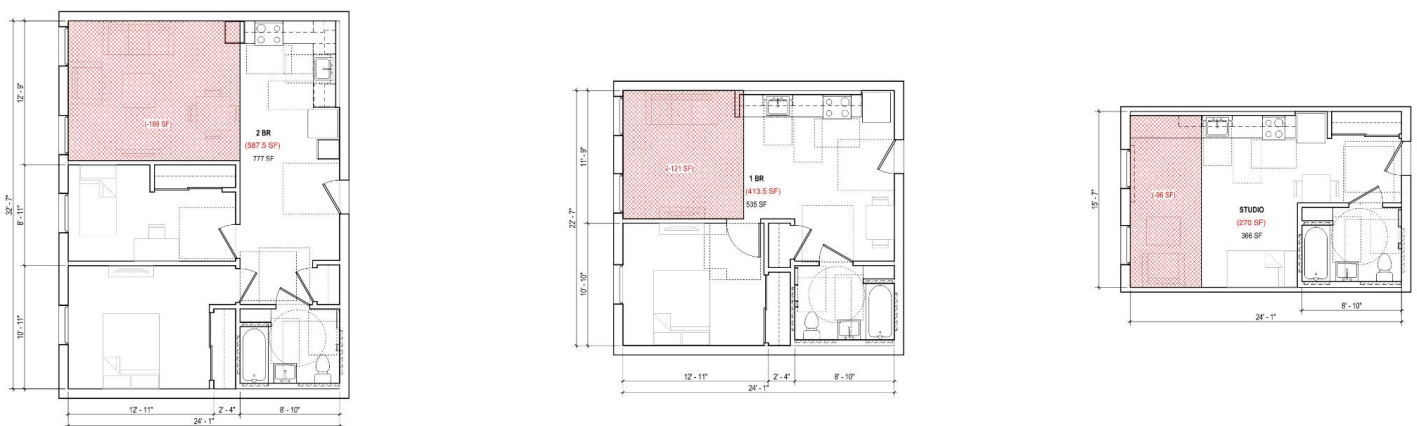


Lot Coverage

Similar to FAR, the request for an increase in lot coverage from 50% to 58% is directly tied to the density increase and FAR increase, as a larger building footprint is needed in order to accommodate the 340 unit affordable housing development. The GMC allows 50% lot coverage in the R-3050 zone, which would limit development to cover only 60,984 square feet. This limitation would reduce the overall project to 257,086 square feet to maintain the 2.45 FAR and proposed height of 75 feet that is needed to accommodate the 340 units. With approximately 112,700 square feet being used for community, office, service spaces, and circulation, only 144,386 square feet would remain for the dwelling units. Maintaining the density of 340 units in this reduced area would result in the following average unit sizes: 270 square foot studios, 413.5 square foot one-bedroom units, and 587.5 square foot two-bedroom units. These average unit sizes would make it physically impossible for the 515 Pioneer Drive Project to provide one or two-bedroom units due to space constraints. This unit size would violate the unit sizes set by applicable funding sources such as the Tax Credit Allocation Committee (TCAC) (minimum unit sizes are 200 square feet for an efficiency, 550 square feet for a one-bedroom and 700 square feet for a two bedroom). See exhibit 02 that graphically illustrates this hardship.

Exhibit 02

Typical Units with overlay of reduced area if maintaining 50% lot coverage



The 515 Pioneer Drive Project is designed to maximize unit yield and to provide functional community space to serve its residents in an urban setting. In order to achieve this, the applicant needs to construct 340 units, in three five-story adjacent buildings with additional FAR and increased lot coverage which will allow more buildable area on the subject site, which in turn allows more units to be developed. These requested waivers from development standards allow a greater number of units to be constructed in the same amount of area. The number of units and sizes of the units proposed would not be able to be constructed without granting the waivers requested. Accordingly, mandating compliance with the FAR and lot coverage standards would physically preclude construction of this affordable housing project.

Thank you,

Regards,

A handwritten signature in black ink, appearing to read 'John Arnold', with a stylized, flowing script.

John Arnold