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DEVELOPMENT CORPORATION

May 1, 2019

Scott Kinsey, Project Planner  
City of Long Beach  
Department of Development Services  
333 W. Ocean Blvd., 4th Floor  
Long Beach, CA 90802

**Re: Density Bonus Application for 1205-1209 Walnut Avenue / 1500 E. Anaheim Street**

Dear Mr. Kinsey:

BRIDGE Housing Corporation and The Children's Clinic 'Serving Children and their Families' (together, the "Applicant") have submitted a Site Plan Review Application for their project (the "Project") proposed at 1205-1209 Walnut Avenue / 1500 E. Anaheim Street (the "Project Site") in the City of Long Beach (the "City"). The Project seeks to develop 88 units of affordable housing and approximately 20,000 square feet of non-residential space to be operated as a community health center with other non-residential uses. This letter supplements the information included in the Site Plan Review Application and consists of the Applicant's Density Bonus Application for purposes of California Government Code (CGC) Section 65915.

The Project Site falls within two existing zoning designations: CCP and R-2-N; however we understand that the Project Site will be rezoned to CCN (HR-65/6) to accommodate the proposed Project. The Applicant reserves the right to modify this Density Bonus Application to reflect potential new development standards that would apply to the Project Site if this is not the case. The information in Attachment A to this letter is provided to help the City identify aspects of the current development standards that would need to be modified to provide for affordable housing costs or physically accommodate the Project.

To provide for housing at the proposed level of affordability, we request that you recommend that the decision-making body approve the Density Bonus Application concurrently with the other related permits and approvals required for the Project.

The Project will provide the City with much-needed affordable housing and community services, and we look forward to working with you through the development process.

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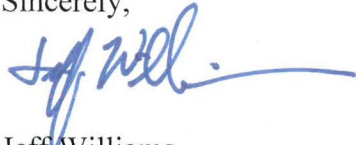
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BRIDGE HOUSING IS A NOT-FOR-PROFIT, PUBLIC-BENEFIT CORPORATION

Please feel free to contact me if you have questions or require any additional information in support of this request.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeff Williams", with a long horizontal flourish extending to the right.

Jeff Williams  
Senior Project Manager

## **ATTACHMENT A**

### **Project Description**

The project proposes to construct approximately 88 units of multifamily rental housing that will be rented as affordable units for lower income households in compliance with Government Code Section 65915 (the "State Density Bonus Law") and LBMC Chapter 21.63 (the "Long Beach Density Bonus Ordinance"). Because the project would include more than thirty percent (30%) of its total units as affordable housing for lower income households, it is entitled to a thirty five percent (35%) increase in maximum density, up to three regulatory concessions, waivers from certain physical development standards, and a reduced maximum parking requirement.

In addition to density bonus units and a parking reduction, the Project is currently requesting two waivers and two permitted regulatory concessions to which the Project is entitled.

Notwithstanding modifications requested pursuant to CGC Section 65915, the Project is otherwise consistent with the City's General Plan and the Zoning Ordinance. Moreover, the density bonus request is consistent with the City's Housing Element Policy 2.1, which calls for the City to provide incentives for affordable units by continuing to implement the City's density bonus program and Policy 5.2, which requires the City to approve density bonuses where feasible to offset or reduce the costs of developing affordable housing. As a development affordable to lower income households, the project will also help the City to meet its RHNA goals for the current Housing Element cycle.

### **Density Bonus**

If a proposed housing development provides at least twenty percent (20%) of its total units as affordable to lower income households, the development is entitled to a maximum density bonus of thirty five percent (35%) over the maximum allowable residential density under the General Plan and Zoning Ordinance. (Gov't Code § 65915(f)(1).)

Here, the Project proposes more than twenty percent (20%) of its total units as affordable to lower income households, so it is entitled to a thirty five percent (35%) density bonus. In the CCN zone, residential uses are permitted at the density allowed in the R-4-N zone, which equals 1 unit per 975 feet of lot area for lots over 22,501 square feet. The Project Site's area is approximately 67,200 square feet, which yields 69 units. With a density bonus, 94 units are permitted on the site.

The Project proposes approximately 88 residential units, which is below with the maximum density permitted on the site in the CCN zone with a Density Bonus.

### **Waiver of Development Standards**

When a project that qualifies for a Density Bonus cannot physically accommodate the density at which it is entitled to develop on the site, the City will waive development standards that otherwise would preclude the development. (Gov't Code § 65915(e).)

Although the CCN zone better accommodates the Project than the current zoning, the CCN development standards related to setbacks and loading regulations preclude the development of the Project's proposed 88 units, and we request that the following standards be waived.

### Setbacks

It is not possible to maintain the proposed unit count and building design while accommodating the ground floor setback requirements and any step-back requirements that would impose greater setbacks to upper floors of the building. Reducing the building envelope to accommodate applicable setback requirements would result in fewer affordable units. Therefore, it is necessary to waive the setback requirements and approve the proposed reduced setbacks as shown on the site plan and floor plans to physically accommodate the Project's proposed density.

### Loading Regulations

In all zoning districts, the City requires off-street loading spaces for medical offices, retail, and office commercial uses that include between 12 and 15 feet of vertical clearance for large and reduced trucks. (LBMC §§ 21.41.310, 21.41.330.) The Project will include a parking garage with 156 spaces to meet the demand for off-street parking (see Parking Reduction section below), however, the parking garage will have a vertical clearance of less than 12 feet. The garage design is integrated as part of the residential component so that level four of the garage serves as open space accessible by residents of the multifamily housing. While the garage design incorporates standard clearance for handicapped vehicle parking, it is not realistic to include increased vertical clearance of 12 to 15 feet for off-street truck loading. Inclusion of increased vertical clearance for truck loading would change the garage configuration, reduce the efficiency of the garage layout, and result in both a taller garage and residential building.

### Regulatory Concessions

The proposed project requires two regulatory concessions to provide for affordable housing costs. Specifically, the project proposes: (1) reduced private deck area; and (2) a parking reduction in addition to the reduced parking requirements available under Density Bonus Law.

If a proposed housing development provides at least thirty percent (30%) of its total units as affordable to lower income households, it is entitled to three regulatory concessions, unless the City makes specific findings for denial. (Gov't Code § 65915(d)(2)(C).) A concession includes a reduction of site development standards, a modification of zoning requirements, or another incentive that results in actual and identifiable cost reductions to provide for affordable housing costs. (Gov't Code § 65915(k).) State law requires that the City shall approve the request unless it finds that the concession is not required to provide for affordable housing costs or that it will have a specific adverse impact on public health, safety, the physical environment, or certain historical resources. (Gov't Code § 65915(d)(1).)

Each of the following concessions would result in actual and identifiable cost savings, which savings are necessary to provide the level of affordability proposed. Moreover, none of the concessions would result in any specific, adverse impacts to public health, safety, the physical environment, or historical resources.

### Open Space - Courtyards and Private Decks

The Long Beach Municipal Code requires 150 square feet of outdoor space per residential unit, with half of the space for private use and half for shared use. This requirement would result in a requirement of 6,600 square feet of shared open space and 6,600 sf of private open space (private decks). The project proposes to provide an 8,800 square foot outdoor community space on the 4<sup>th</sup> level of the garage. In addition, a 4,500 square foot courtyard is provided on the ground floor for the community health center. Private decks and “Juliet” balconies are provided at three bedroom and two bedroom units, respectively. The total private deck space is approximately 2,044 square feet. Allowing for reduced private open space requirements will result in an actual and identifiable cost savings to the Project, therefore, it is necessary to waive the standard individual deck size requirement to physically accommodate the Project's proposed 88 affordable units.

### Parking Reduction

Although Government Code section 65915(p) provides that density bonus projects are entitled to a reduction in parking standards upon request of the developer, an additional parking reduction for the commercial (health clinic) component is requested as a concession.

Under the LBMC, the 18,100 sf health clinic use on the Project Site would require an additional 85 parking spaces. Government Code Section 65915.7 allows a 20% reduction in this parking requirement, which would result in a requirement of 68 spaces. The Project proposes to provide 60 parking spaces for the health clinic. A concession is requested to allow the reduction of 8 spaces from what is allowed under Density Bonus Law for the clinic use.

To provide justification for the proposed clinic parking, a traffic consultant (LLG Engineers) was engaged to provide a parking study. This Parking Demand Analysis by LLG Engineers dated March 27, 2019 has been submitted to the City under separate cover. The study evaluated the clinic's parking demand at a comparably sized clinic in a nearby City with limited public transit. The actual observed parking demand was translated to the Anaheim & Walnut location, taking into account transit availability, and a parking demand of 60 spaces was determined to be adequate.

Regarding residential parking, under the Density Bonus Law, a project that is 100% affordable housing and located within one-half mile of a High Quality Transit stop, has a parking requirement of 0.5 spaces per unit. The 32 one-bedroom units, 32 two-bedroom units, and 24 three-bedroom units would require 44 parking spaces. 96 parking spaces, well in excess of the 44-space requirement, are proposed for the residential component to meet operational needs.

The total amount of proposed parking is therefore  $96 + 60 = 156$  spaces. Reducing the required health clinic parking spaces to 60 as part of the overall 156 proposed spaces results in an actual and identifiable cost reduction for the Project, and these cost savings are necessary to provide a 100% affordable development on the Project Site.