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**From:** Tobin Symmank  
**Sent:** Friday, April 25, 2014 3:05 PM  
**To:** 'HCD Lists'  
**Cc:** '[shuff@hcd.ca.gov](mailto:shuff@hcd.ca.gov)'; 'Deidre Benbow'  
**Subject:** RE: 2013 California Green Building Standards Code (CALGreen)

Dear HCD,

The proposed requirement (Cal Green 4.106.4.2) asserts that an ADDITIONAL 3% of the total parking stalls required for a multi-family project be provided for EVCS OVER AND ABOVE the number of stalls already required by local jurisdictions. This is a HUGH COST INCREASE imposed upon a developer.

Example of a typical high-density (65-95 du/acre) multifamily project:

300 units (most single projects currently range from 280-400 units these days)

1.75 parking stalls per unit (typical average)

525 parking stalls required

16 ADDITIONAL EVCS Stalls (3%)

Average cost per stall: \$15,000-\$20,000 (typical Wrap-type residential project in which the apartments are wrapped around a tiered parking structure; a Podium-type residential structure costs even more).

COST FOR ADDITIONAL STALLS = \$240,000-\$320,000, which is \$800-\$1,067 PER UNIT

THIS IS JUST FOR THE STALLS ALONE, AND DOES NOT INCLUDE THE INSTALLATION COSTS OF PRE-RUNS FOR FUTURE EVCS CHARGING.

I ask that you please reconsider this requirement.

Thank you,

**Tobin Symmank**, *Architect, LEED BD+C, CGBP, NCARB* Principal | **ARCHITECTS ORANGE**  
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