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<th><strong>Docket Number:</strong></th>
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<td><strong>Project Title:</strong></td>
<td>Research Idea Exchange</td>
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<td>Campus Property Group Comments and Thoughts Arising from the January 10th Presentation</td>
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Submitted On: 1/17/2019
Docket Number: 19-ERDD-01

and Thoughts Arising from the January 10th Presentation

Additional submitted attachment is included below.
January 17th 2019

California Energy Commission
Research and Development

The Next EPIC Challenge

I am pleased to present below comments and thoughts arising from the January 10th presentation. I am delighted that the CEC is taking the initiative to promote much needed innovative thinking in construction and reducing the carbon impact of new development. I am particularly pleased that the approach is ‘real world’ with intent of actually constructing buildings that will provide lessons for broader application.

I make these comments as an experienced developer who has addressed these issues on a variety of projects. I hope my thoughts are helpful.

Prequalification. As suggested, I think a short prequalification process to reduce the number of participants would be helpful. Just putting together the initial submission will require considerable time and effort and if participants know they are in reasonably sized pool the time and effort and therefore quality of submissions, will surely be higher.

Timing of Phase 1. The suggestion is currently that Phase 1 should take 12 – 15 months, this seems considerably longer than either necessary or desirable. I believe a qualified and prepared team should be able to put together a detailed design proposal in 6 months. Shortening the time will improve the prospects for basing the proposal on an actual property.

I think it was generally felt at the presentation that having the design proposal based on actual property would be much preferable to an abstract proposal. It would not only focus the submissions into a ‘real world’ context but make the transition to Phase 2 easier and quicker. It is clear to me as a developer, that having a ready to go (CEQA approved property) available through both phases will be a significant challenge. However, the shorter the time frames the more likely it is that this will be possible.

Density. The suggested criteria are for a single building with a minimum of 130 residential units on a City Block. City blocks vary but that implies an average density of +/- 55 dwelling units per acre. That is a very high density typically only achieved (or allowed) in locations such as San Francisco, Oakland, San Jose etc. It may be somewhat easier in Southern California. The project will have to provide amenity and/or open space and parking. Parking in a structure is expensive, parking underground is prohibitive except in certain locations. (I appreciate we should be reducing parking but some is necessary in almost every situation).
Setting the density excessively high limits the ability to scale into future projects. It also presents a conflict in meeting the criteria for disadvantaged communities, many of which will not support the economics of higher development.

**Mixed-Use.** I understand the reason for setting mixed-use as a requirement but as I commented in the meeting this introduces a series of other complications into the project which don’t really assist in the focus of the challenge. Multiple uses in one building can result in the need for separate service (HVAC, power etc), separate vertical access (stairs and elevators), separate ground floor access and quite likely a more complicated parking arrangement. All of these result not only in additional direct costs but loss of useable (ie rentable / saleable) floor area.

I think the intent can be better addressed by setting out some other general criteria for example:

- Urbanized location
- Medium to high density. Not less than 22 dwelling units per acre.
- Multifamily
- Minimum of three stories, preferably higher.
- Location with reasonable access to transit and access to retail and other services.

I would be happy to provide specific examples of projects that would meet these criteria if that would be helpful.

I think the criteria can (and should) be left somewhat generic. I would also strongly caution against setting the bar too high on density, height etc as noted above.

Thank you for your consideration and I look forward to participating in this exciting opportunity!

Sincerely,

Robert Upton