

**DOCKETED**

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## **Density requirement may unreasonably limit applications from suburban areas**

We understand the initial proposal for the EPIC grant calls for 50 units with minimum density of 100 DU/acre. We are concerned that such a requirement would exclude most of the suburban areas. We understand the general desire to induce higher-density developments, help reduce urban sprawl, and reduce commuting and thus GHG emissions. But as a funding of demonstration projects, having such a high threshold requirement inevitably precludes more applications which could offer innovative ideas that could have an impact on communities where such high densities are not economical, acceptable by existing neighbors, and/or allowed by local governments. Since this is a competitive funding source, having less restrictive threshold requirements will most likely broaden the range of projects that would be proposed and allow you to choose projects that have could have the most impact. These projects may not be your ideal projects, but could be the ones that can be replicated many times over because they are more suitable for the general public at this time.

For years, AHSC required 30 DU/acre, and most projects in suburban areas of Southern California found it hard to achieve such density and thus few family projects were proposed. Our architects tried and concluded that for the value of the land in the Riverside-San Bernardino metro area, achieving 30 DU/acre, which inevitably requires subterranean or podium parking and building more than three stories, does not make economic sense and would not be approved in a lot of areas anyway (too dense and/or too tall...).

Our best effort to increase density got us to about 26 DU/acre before we have to do podium/subterranean parking in order to achieve the required parking ("no parking" is not viable nor allowed in most of Southern California). Beyond that density, the cost curve goes way up as we have to build Type I instead of Type III or V. Therefore, CEC may wish to hire some architects and get their comments on what density would be economical and also representative in such a way that these demonstration projects can be replicated many times elsewhere, instead of only in the most expensive areas. Thus we suggest that CEC drop the density requirement to 20 or so if it really wants suburban areas to participate. CEC can always make density a scoring item to encourage higher density developments.