

To: California Building Standards Commission. Department of Housing and Community Development
From: HPI Architecture
Date: July 1, 2024
Subject: 45-Day Express Terms for Proposed Building Standards.
2025 CALGreen Rulemaking. Residential Bicycle Parking for Senior Living and Assisted Living Communities.

To whom it may concern:

HPI Architecture respectfully submits this letter in response to the California Building Standards Commission (CBSC) and Department of Housing and Community Development (HCD) 2025 CALGreen proposed updates under Chapter 4 Residential Mandatory Measures, specifically the addition of residential long-term and short-term bicycle parking. First, we would like to acknowledge the committees' efforts in continuously improving CALGreen language and appreciate the opportunity to provide these comments.

With 25 years of continuous experience designing assisted living, memory care and independent living communities in California, we would like to bring attention to the proposed residential bicycle parking language as it may pertain to senior living and assisted living communities.

According to CDC's National Center for Health Statistics, American Health Care Association (AHCA), and the National Center for Assisted Living (NCAL), 'there are approximately 30,600 assisted living communities with nearly 1.2 million licensed beds in the United States today'.¹ In California around half of assisted living residents are at least 85 years or older, 36% are 75 to 84, 11% are 65-74, and 2% are under 65 years of age.² For residents, common health conditions vary from high blood pressure, diabetes, heart disease, and depression.² At least 40% of residents are diagnosed with Alzheimer's disease and dementia.² Daily assistance may be needed with bathing, walking, dressing, toileting, and eating.² 'Many senior living communities offer assisted living accommodations, care, and services as part of a continuing care retirement community (CCRS) structure'.³ In some cases, assisted living communities may also be licensed as Residential Care Facilities for the Elderly (RCFE). RCFE projects are designed for elderly, ambulatory, non-ambulatory and/or bedridden residents. Designed for ages 60 years and older, RCFE's provide various levels of care, sometimes allowing persons under 60 years of age with compatible needs to be admitted. RCFE's are intended to assist, on a 24-hour basis, occupants who, because of age, mental disability or other reasons, need a supervised environment which also provides personal care services. According to the California Association of Health Facilities (CAHF), more than half of RCFE residents require assistance with more than one activity of daily living.⁴

It is understood that the purpose of CALGreen is to improve public health, safety and general welfare by enhancing design and construction, and that bicycle parking amenities can continue to encourage physical activity in our communities. However, it is important to acknowledge that CALGreen Chapter 4 residential measures have yet to consider senior living communities and sub residential occupancies such as R-2.1, R-3.1, and R-4 where residents may likely not benefit, need, and/or use amenities for bicycles. In the case that residents can physically ride bicycles, the quantity needed may be limited and challenging, as providing short and long-term bicycle amenities that are accessible to all may require more space than normal since high-density rack systems typically stack bicycles to maximize the use of limited spaces.

For your consideration, we propose that senior living and assisted living community projects as referenced above be exempt from residential bicycle requirements. Although we understand that there may be an opportunity to request an exemption from local jurisdictions, acknowledging this typology directly in CALGreen language will help keep reviews concise throughout the multiple municipalities.

We appreciate the committee's time and consideration and thank you again for the opportunity to provide feedback.

Respectfully,

HPI Architecture Team

Resources:

1. [Facts & Figures \(ahcancal.org\)](https://ahcancal.org)
2. [National Center for Assisted Living - California Assisted Living Numbers](https://www.nationalcenterforassistedliving.org)
3. [Assisted Living Statistics And Facts In 2024 – Forbes Health](https://www.forbes.com)
4. [Facts and Statistics \(cahf.org\)](https://cahf.org)