

**From:** [Tobin Symmank](#)  
**To:** [Title\\_24@HCD](mailto:Title_24@HCD)  
**Subject:** FW: Review of the Proposed Changes  
**Date:** Friday, July 19, 2024 5:14:22 PM  
**Attachments:** [image005.png](#)  
[image006.png](#)  
[image007.png](#)  
[image008.png](#)  
[image009.png](#)  
[image001.png](#)

---

Additional concerns...

The proposed Chapter 4 - 4.106.4.2.2.1 EV Ready Parking Spaces with Receptacles, requires one charging receptacle to be provided per dwelling unit. (1:1), unless the number of units exceeds the number of parking spaces (for assigned OR unassigned conditions per sub-para 'a' & 'b')

HOWEVER, the same allowance is not specifically afforded when a project provides both assigned and unassigned spaces (sub-para 'c'). Is this deliberate or an oversight?

ALSO, since basically all parking has now become EV parking with the 2025 proposed 1:1 requirement, the dimensional 9'x18' space requirements for EV parking now precludes and makes obsolete the allowance of most Cities to provide compact parking spaces 7'-6"x15'. Such compact spaces are an important part of meeting required operational quantities while minimizing the associated land/building footprint, especially for affordable housing projects. Without adjusting the EV stall dimensions to include compact stalls, the new proposal has the unintended consequence of REMOVING possible parking from a project, perhaps even to the point of making a project infeasible.

Thank you,  
**Tobin Symmank, NCARB** | Principal  
T 714.639.9860 M 714.308.1764



[\[aoarchitects.com\]](#)

DISCLAIMER: Click to view disclaimers that apply to this email and any attachments. [\[aoarchitects.com\]](#)

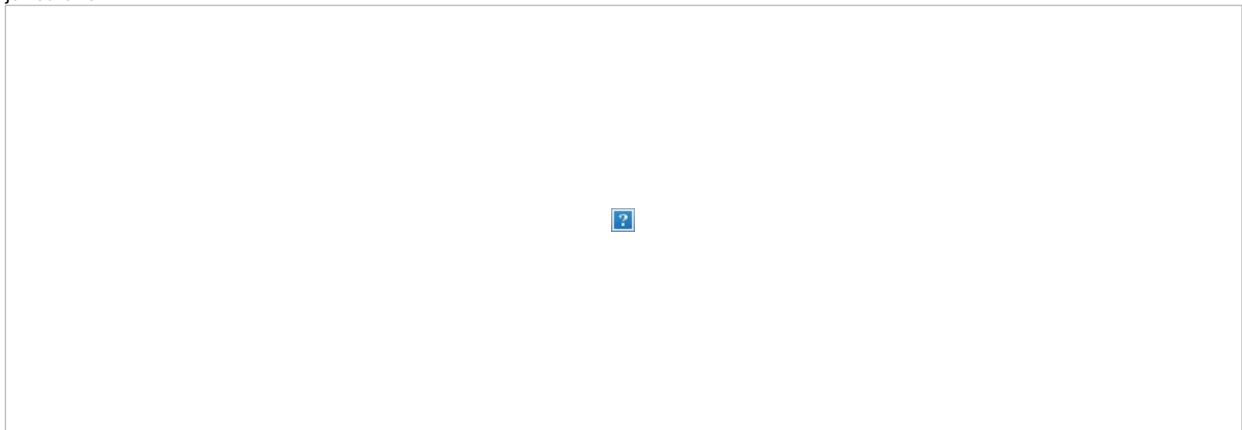
---

**From:** Tobin Symmank  
**Sent:** Thursday, July 11, 2024 11:52 AM  
**To:** 'Title24@hcd.ca.gov' <Title24@hcd.ca.gov>  
**Subject:** RE: Review of the Proposed Changes

Good morning, it was good to be part of the July 2 Hearing, and thank you again for allowing public comment to positively influence the rule-making.

I had an additional concern: The currently proposed text for Section 4.106.4.2.2.1.d seems unreasonable to tie EV electricity to a dwelling unit-associated panel.

Firstly, the house panel serving the dwelling unit will be separate and likely far-removed from the individual dwelling unit. Secondly, what if a resident becomes permanently or temporarily disabled. They would need a different parking space, which is not connected to their subpanel. Please strike this language which will place the burden on architects to argue this with each submittal and each jurisdiction.



Thank you for your consideration.  
**Tobin Symmank, NCARB** | Principal  
T 714.639.9860 M 714.308.1764



[\[aoarchitects.com\]](#)

DISCLAIMER: Click to view disclaimers that apply to this email and any attachments. [\[aoarchitects.com\]](#)

---

**From:** Tobin Symmank

**Sent:** Monday, June 24, 2024 4:29 PM

**To:** [Title24@hcd.ca.gov](mailto:Title24@hcd.ca.gov)

**Subject:** Review of the Proposed Changes

Good afternoon,

Review of the proposed changes (Title 24 Green Building) elicits a couple areas needing clarification:

1. Section 4.106.4.2.2 (1) Multifamily EV Ready Parking Spaces with Receptacles: low power level 2 (@ assigned or unassigned stalls): 1 per dwelling unit. Understood.
2. **HOWEVER**. The next section 4.106.4.2.2 (2) Multifamily EV Ready Parking Spaces with EV Chargers: In addition to the Receptacles, Level 2 Chargers to be provided for 25% of Common Use and Unassigned spaces. *Suggest relabel to "Common Use Unassigned" to distinguish from "unassigned" of prior Section (1); Otherwise, a wrongful interpretation could be made that "unassigned" spaces need to have **both** receptacles (per sub (1) **AND** charger (per sub (2)).*
3. Multifamily Short term bicycle parking: 1 space per 10,000 sf *(A requirement for multifamily residential is typically based upon dwelling unit count (not SF) and would be consistent with the requirement for Long-term bicycle parking. Tying to an overall SF is not specific enough and **could** include gross SF, **BUT** could **also** include the parking structure GSF that serves the residential, the latter of which is certainly not feasible (though not specifically excluded in the requirement).*

Thank you for your consideration,

**Tobin Symmank, NCARB** | Principal

321 West Chapman Avenue, Orange, CA 92866

T 714.639.9860 M 714.308.1764



[\[aoarchitects.com\]](http://aoarchitects.com)



[\[facebook.com\]](https://www.facebook.com)



[\[linkedin.com\]](https://www.linkedin.com)



[\[instagram.com\]](https://www.instagram.com)

DISCLAIMER: Click to view disclaimers that apply to this email and any attachments. [\[aoarchitects.com\]](http://aoarchitects.com)