



October 28, 2021

To: California Building Standards Commission

cbsc@dgs.ca.gov

<http://dgs.ca.gov/BSC/e-comments>

Re: Final 2022 Residential CALGreen, EV Infrastructure

We the undersigned California state legislators are writing to express our interest in the Building Standards Commission's proposed changes to Title 24, Part 11 of the CALGreen 2022 Building Code, specifically relating to electric vehicle infrastructure in new multifamily buildings.

California is reeling from devastating climate impacts—wildfires, degraded air, extreme heat and drought—while scientists flash a “[code red for humanity](#).” To preserve a livable climate, we must take bolder climate action, focused through a lens of equity.

Reducing greenhouse gas emissions is already a top state priority. Recognizing that the transportation sector now accounts for close to 50% of all emissions within the state, the legislature and two administrations have made clear their intent to move aggressively to support a transition to zero emission vehicles (ZEVs), including setting the following targets:

- 1 million ZEVs or near-ZEVs by 2023 (SB 1275, De Leon 2014)
- 5 million ZEVs by 2030 (Exec. Order B-48-18, Brown 2018)
- 100% of sales of new passenger cars and trucks will be zero-emission by 2035 (Exec. Order N-79-20, Newsom 2020)

However, it is clear that we will not reach these targets *equitably* unless all residents have an affordable, reliable and convenient place to charge their electric vehicles (EVs), which means the ability to charge *at home*. While California must also increase its public charging infrastructure to support long-distance trips, public charging costs are unregulated and usually much more expensive -- public charging should be the option of last resort. ***We are therefore concerned that your agency is failing to ensure the necessary infrastructure in new construction for an equitable transition to EVs.***

Since 2015, the California Green Building Standards Code (CALGreen) has required 100% of new single-family homes to be EV capable. But the currently-proposed code update requires only *40% of parking in new multi-family housing* to be wired for charging. We applaud your mandate that this access be truly-EV ready; but we are concerned

that the code still excludes a significant portion of California condominium and apartment residents from convenient and inexpensive charging access. Recognizing that multi-family residents are more likely to be people of color and low-income, this disparity perpetuates systemic race and class inequities and disproportionate air pollution burdens. As EVs become increasingly mainstream, this double standard must go.

We therefore urge you to join [cities](#) throughout the state in ensuring that ***every new Multi-Family Housing (MFH) unit with parking has access to EV-ready charging.***

Specifically, ***all new MFH units with parking must include EV Ready charging access, via a receptacle or EV charging cordset, with prominent signage indicating it is EV Ready.*** Whenever possible, the EV wiring should be run via the unit's electricity meter.

We are aware that your own code advisory committee recommended that Housing and Community Development (HCD) consider a [proposal](#) for equitable access in this code cycle, which HCD declined to study. We are also aware that your agency received an [expert analysis](#) showing that it would cost developers a negligible additional amount (0.03%) to ensure that every new apartment and condo with parking has access to charging – and that installing charging up front, rather than retrofitting later, would save California up to \$1.4 billion.

We urge you to stop being penny wise, and pound foolish. Installing EV charging infrastructure at the time of new construction is by far the least expensive way to build EV charging access, as retrofitting can be [four](#) to [ten](#) times more expensive. Installing EV charging at the time of construction also helps to create good jobs, and to ensure that charging infrastructure is installed with skilled, unionized labor.

If the code isn't strengthened, the majority of new apartment and condo residents will continue to lack access to the financial and health benefits of driving electric vehicles with affordable, at-home charging. Without this access, they are less likely to get EVs, and California will fall short of its climate goals.

California has shown that we can cut our carbon emissions AND grow our economy. We can electrify our transportation system AND make it accessible to all. It is time to stop paying lip service to equity; and time to stop settling for incremental change that will doom us to ongoing climate catastrophe.

We urge you to act with courage, and in the interests of climate justice, and stop allowing **buildings to be built without the necessary infrastructure to meet our urgent EV targets.**

Sincerely,



Dave Cortese
Senator, 15th District



Monique Limón
Senator, 19th District



Henry Stern
Senator, 27th District



Anthony Portantino
Senator, 25th District



Ben Allen
Senator, 26th District



Josh Newman
Senator, 29th District



John Laird
Senator, 17th District



Mark Stone
Assemblymember, 29th District



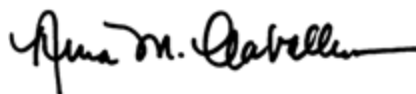
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