

CALGreen 2022: Public Comments - Suggested Talking Points

Submit your comments by Sept. 27 via email to cbsc@dgs.ca.gov, and cc: evchargingaccess@gmail.com -- **the sooner the better!**

Use [this sample email](#) as a template. Commenters can also use this [e-comment form](#), referencing the proposed code standards listed below.

General CALGreen (Can apply to Residential and Non-Residential -- see below)

The California climate crisis is here. How many more communities need to burn down before we address this crisis at the scale and pace required? FDR made tanks and planes in less than a year to fight WWII -- **it's time for us to face the climate crisis with the same level of courage and ambition. This includes electrifying our transportation, and rethinking our building codes.**

The state's ambitious, necessary Electric Vehicle goals mean that EV adoption is set to increase exponentially--and our building codes aren't keeping up. **Small, incremental changes to these codes are no longer sufficient to meet the coming demand for EV charging.**

Without improved access to EV charging infrastructure, California is unlikely to meet its climate goals -- and our disadvantaged communities are unlikely to reap the financial and health benefits of EV driving.

The current proposed building code won't come into force until 2023, and will affect new buildings into the late 2020's. **We have less than ten years to address the climate crisis -- we must stop building residential parking that doesn't support electric vehicles.**

Over 20 California cities have already passed EV reach codes; it's time for CALGreen to level the playing field and provide access to EV benefits in *all* California communities.

All EV Capable and EV Ready spaces should be labeled as EV charging spaces with highly-visible signage. Prominent signage increases EV awareness and encourages adoption.

The Building Standards Commission should use typical parking "dwell times" as criteria for determining EV infrastructure requirements. How long an EV is parked will determine what kind of charging makes sense in that location.

Installing infrastructure at the time of new construction is the cheapest way to build EV charging access. Leaving out EV infrastructure in new construction is penny-wise, and pound-foolish; installing it during new construction will save the state billions.

Residential CALGreen

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Proposed Building Standard: Title 24, Part 11, chapter 4, Section 4.106.

Proposing agency: HCD

Since 2015, CALGreen has required EV charging access in 100% of new single family homes; but it has only required charging access for a small percentage of multi-family homes (MFH). **This disparity is simply not fair to multi-family residents -- who are disproportionately people of color, have lower income on average, and often live in disadvantaged communities.** Even higher-income condo residents face uphill battles to get access to power for EV charging.

To meet California's climate and equity goals, the **2022 CALGreen code cycle should provide access to electric vehicle charging for each unit with parking in all new Multi-Family Housing.**

An equitable CALGreen building code must acknowledge and address the fact that **parking access and decision-making power for MFH residents is different than it is for single family homeowners.**

An equitable CALGreen code should require for *all* MFH units with parking:

- 1. an EV space wired directly to the corresponding unit's electricity meter whenever possible;**
- 2. true EV Ready 'plug-and-play' charging access, via power to an electric outlet or an EV charging cordset;**
- 3. prominent labeling of EV charging spaces with highly-visible signage.**

EV drivers almost always charge their cars at home. Home charging is by far the most convenient and most *economical* way to fuel an EV -- because charging at home enables access to the lowest rates offered by electric utilities. **Equity demands that multi-family residents be offered the same access to low-cost power as residents of single-family homes.**

Overnight charging can provide enough range for the average commute, even using low power. Low power charging costs less to install, and should be considered as an option for residential charging.

Non-Residential CALGreen

Proposed Building Standard: Title 24, Part 11, Chapter 5, Section 5.106.

Proposing agency: BSC

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A third of Californians live in existing multi-family housing that does not provide EV charging, and these residents will need to charge at their workplace. **A minimum 50% of employee parking spaces in new non-residential construction should be EV ready, with prominent EV charging signage.**

Power sharing is preferable to space sharing, when it comes to EVs. Businesses shouldn't be burdened or distracted by staff sharing a small number of high-powered charging stations throughout the work day.

Most employees park at work for long stretches of time, so low-power charging can provide them with enough range for an average commute. Workplace charging programs can be implemented with very low-cost fee structures and mechanisms.

Providing day-time, low-power EV charging to employees provides grid benefits, including grid stability and lower long-term grid capital costs.

Workplace charging is preferable to public charging; it is far more convenient, and usually less expensive.

Questions? Reach out to us at evchargingaccess@gmail.com