

Instructions for completing this form

1. Use of this form is optional. It helps CBSC and other state proposing agencies to correctly administer your comments.
2. For matters to be considered at a public CBSC Code Advisory Committee (CAC) meeting, written comments should be received at least seven days before the scheduled meeting.
3. For matters subject to a 45-Day or 15-Day public comment period announced by a Notice of Proposed Action (NOPA), written comments **must be received** on or before the close of the comment period identified in the NOPA.
4. Separate comment forms are necessary for CAC and public comment periods.
5. Separate comment forms are necessary for each state agency proposal.
6. This form is available in fill-and-print format at the CBSC website, www.bsc.ca.gov, for you to complete and submit electronically. Or print a blank form and type or complete by hand. You may attach additional pages if necessary.
7. Submit comments to CBSC, 2525 Natomas Park Drive, Suite 130, Sacramento, CA 95833-2936, or by email to cbsc@dgs.ca.gov. Please do not fax comments.
8. Written and oral comments may also be provided at CBSC public meetings to consider the proposed building standards.

For assistance, call CBSC at (916) 263-0916 or email cbsc@dgs.ca.gov.

Building Standards Nine-Point Criteria. Health and Safety Code Section 18930(a) reads:

(a) Any building standard adopted or proposed by state agencies shall be submitted to, and approved or adopted by, the California Building Standards Commission prior to codification. Prior to submission to the commission, building standards shall be adopted in compliance with the procedures specified in Article 5 (commencing with Section 11346) of Chapter 3.5 of Part 1 of Division 3 of Title 2 of the Government Code. Building standards adopted by state agencies and submitted to the commission for approval shall be accompanied by an analysis written by the adopting agency or state agency that proposes the building standards which shall, to the satisfaction of the commission, justify the approval thereof in terms of the following criteria:

- (1) The proposed building standards do not conflict with, overlap, or duplicate other building standards.
- (2) The proposed building standard is within the parameters established by enabling legislation and is not expressly within the exclusive jurisdiction of another agency.
- (3) The public interest requires the adoption of the building standards. The public interest includes, but is not limited to, health and safety, resource efficiency, fire safety, seismic safety, building and building system performance, and consistency with environmental, public health, and accessibility statutes and regulations.
- (4) The proposed building standard is not unreasonable, arbitrary, unfair, or capricious, in whole or in part.
- (5) The cost to the public is reasonable, based on the overall benefit to be derived from the building standards.
- (6) The proposed building standard is not unnecessarily ambiguous or vague, in whole or in part.
- (7) The applicable national specifications, published standards, and model codes have been incorporated therein as provided in this part, where appropriate.
 - (A) If a national specification, published standard, or model code does not adequately address the goals of the state agency, a statement defining the inadequacy shall accompany the proposed building standard when submitted to the commission.
 - (B) If there is no national specification, published standard, or model code that is relevant to the proposed building standard, the state agency shall prepare a statement informing the commission and submit that statement with the proposed building standard.
- (8) The format of the proposed building standards is consistent with that adopted by the commission.
- (9) The proposed building standard, if it promotes fire and panic safety, as determined by the State Fire Marshal, has the written approval of the State Fire Marshal.



October 29, 2018

Marybel Batjer
Secretary, California Government Operations Agency
Chair, California Building Standards Commission
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Mia Marvelli
Executive Director, California Building Standards Commission
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Subject: Proposed Division of the State Architect CALGreen Electric Vehicle Infrastructure Amendments

Dear Ms. Batjer, Ms. Marvelli, and Ms. Clair,

The coalition of organizations submitting this letter appreciates the opportunity to comment on and supports the proposed 45-Day Expressed Terms for Proposed Building Standards of the Division of the State Architect (DSA) Regarding the Adoption of the 2019 California Building Standards Code (CALGreen). We represent a diverse coalition of organizations – charging station providers, environmental nonprofits, and utilities – that are committed to a future of electrified transportation.

Robust charging infrastructure is needed to unlock the benefits of transportation electrification for California. We are very pleased to see DSA extend EV readiness measures to new construction for California's public schools and community colleges, so that faculty, staff, students, and visitors can access the benefits of EVs. These efforts are consistent with funding by state agencies such as the California Air Resources Board and the California Energy Commission for electric transportation at schools. We also note that DSA's proposed CALGreen provisions will facilitate the future installation of EV charging stations and allow more Californians—who may not have access to charging at home—to drive electric. EV charging at workplaces, multi-unit dwellings, and in public locations has helped give more drivers the confidence to drive electric and schools will also play an important role in encouraging and allowing more Californians to drive an EV.

We also want to highlight the importance of addressing infrastructure in existing buildings as noted in the 2018 ZEV Action Plan.¹ We recommend that DSA update its building code requirements in the future to include renovations such as expansion or renovation of electrical systems serving parking areas, expanding existing parking areas, and repaving projects.

Lastly, we recommend increasing the mandatory minimum ratio of EV ready parking spaces at schools in the near future, as noted in the 2018 ZEV Action Plan, to help support the State's goals for EV infrastructure and EVs. We look forward to working with DSA in future code cycles to strengthen codes to meet the growing EV adoption and infrastructure demand across California.

Thank you for your consideration of these comments and for your leadership, hard work and thoughtfulness in achieving EV readiness at California schools.

cc: Ken Alex
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Governor's Office of Planning and Research

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¹ <http://business.ca.gov/Portals/0/ZEV/2018-ZEV-Action-Plan-Priorities-Update.pdf>

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