

**From:** [DGS Website@DGS](mailto:DGS_Website@DGS)  
**To:** [CBSC@DGS](mailto:CBSC@DGS)  
**Subject:** PUBLIC COMMENT on PROPOSED BUILDING STANDARDS - Vanessa Warheit  
**Date:** Thursday, October 28, 2021 8:00:42 PM

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Commenter Contact Information

Name: Vanessa Warheit

Date: 10/28/2021 12:00:00 AM

Representing: EV Charging Access for All coalition Mailing Address Number and Street:

City:

State:

Zip Code:

Telephone #: 4152254435

Email: [evchargingaccess@gmail.com](mailto:evchargingaccess@gmail.com)

Proposed Building Standard

Title 24 Part #: Part 11

Section #: EV Infrastructure

Proposing State Agency: Housing & Community Development This comment is intended for review during: 15-Day Comment Period

Your recommendation based on the criteria of Health and Safety Code Section 18930(a):  
Further Study Required

In support of your recommendation above, provide the rationale based on the criteria of Health and Safety Code Section 18930(a). If you recommend anything other than approve, cite the criteria in your comment. If you oppose a proposed building standard, offer a solution or alternative for the state agency to consider.

Thank you for the opportunity to provide comment on the latest draft of the 2022 CALGreen building code, released on October 13.

We are deeply disappointed that this slightly revised draft does not reflect in any way the over 2,000 comments you received as part of the 45-day public comment period, demanding equity for electric vehicle (EV) charging access in the CALGreen building codes. Nor does it reflect any of the suggestions you received from our coalition on September 27, 2021, which built on prior correspondence our coalition has had with you, beginning in December of 2020.

In letters dated Dec. 24, 2020, Jan. 14, 2021, Feb. 19, 2021, April 5, 2021, and April 16, 2021, we have repeatedly asked you to ensure that residents of new multi-family housing receive the same access to the cost, health, and time-saving benefits of home EV charging that residents of new single-family housing have enjoyed since 2015.

Our letter of September 27 also included an expert-reviewed cost-benefit analysis, detailing that a modest additional \$28 million investment in EV charging infrastructure would save the state over \$1.4 billion in avoided costs. We all know installing EV infrastructure at the time of new construction

is far cheaper than retrofitting later. Providing equitable access to EV charging in multi-family housing results in greater economic and health benefits for residents, workers, and for California as a whole, while yielding greater emissions reductions at significantly lower cost.

In fact, the only substantive change to the code in this version was a step backward, increasing costs and complexity by 'clarifying' language about Automated Load Management Systems (ALMS). This change would, in effect, provide a disincentive to developers for providing charging above the minimum required, by further limiting the potential of ALMS. The code already sets minimum power capacity thresholds for stations that are managed by an ALMS, which can provide EVs with sufficient energy. We therefore strongly urge you to remove this new language from the code and retain the language from the previous version.

We need an equitable CALGreen that ensures we spend limited resources wisely and achieve a widespread transition to electrified transportation as fast as possible. The transition to electric vehicles is well underway, and ALL Californians deserve to participate. As California faces an accelerating climate emergency, and struggles to meet the Governor's and legislature's ambitious goals to electrify the transportation sector, your agency can and must do more. We therefore urge you to:

- \* Increase the residential EV Ready percentage from 25% to 85%
- \* Increase the number of EV spaces to 20% EV Ready and 30% EV Capable for all Non-Residential sites
- \* Return missing ALMS language to Non-Residential CALGreen, and remove the 'clarifying' ALMS language from this version
- \* Include prominent signage at all EV Capable/EV Ready parking spaces
- \* Include missing retrofit language in Non-Residential CALGreen

The rationale for each of the above is found in our letter of September 27, 2021.

Sincerely,

Organizations:

1000 Grandmothers for Future Generations, Susan Penner, DrPH  
350 Butte County, Mary Kay Benson, Steering Council Manager  
350 Contra Costa, Lisa Jackson, Leadership Team Member  
350 Humboldt, Daniel Chandler, 350 Humboldt Steering Committee  
350 Sacramento, Ilonka Zlatar, President  
350 Silicon Valley, Nicole Kemeny, Concerned Citizen  
350 Sonoma, Christine Hoex, EV driver since 2017 Acterra, Linda Hutchins-Knowles, Karl Knapp GoEV Senior Manager African Beads For Good, Jeanne Pimentel, Retired editor, goodwill ambassador  
Berkeley Climate Action Coalition, Pheng Lor, Ecology Center Program Manager & BCAC Convener  
Berkeley Electrification Working Group, Amy Kiser, Co-Chair California Climate Action Coalition, Ben Gould, Founder Carbon Free Palo Alto, Bruce Hodge, Founder Center for Biological Diversity, John Fleming, Ph.D., Senior Scientist Center for Community Energy, Jose Torre-Bueno, Executive Director CHARGE ACROSS TOWN, Maureen Blanc, Director, EV Driver since 2014 Clean Coalition, Craig Lewis,

Executive Director Climate Equity Policy Center, Sara Zimmerman, Director Climate Health Now, Cynthia Mahoney, MD and EV driver since 2019 ClimateLink, Ravi Mikkelsen, Founder Coalition for Clean Air, Christopher Chavez, Deputy Policy Director Coltura, Janelle London, Co Executive Director Community Resource Project, Luis Sanchez, CEO Cool the Earth, Annika Osborn, Community Outreach County Climate Change Alliance, Marian Sedio, volunteer DRAWDOWN Bay Area, Leslie Alden, Executive Director Drive Clean Bay Area, Annika Osborn, Program Director Ecology Action, Mahlon, Vice President Ecology Center, Denaya Shorter, Community Engagement Director Elders Climate Action, Marin Interfaith Climate Action, Katherine DaSilva Jain, Volunteer Elders Climate Action's NorCal chapter and SoCal chapter, Bill Murphy, Policy and legislation volunteer Electric Auto Association of Central Coast CA, Beverly DesChaux, President Electric Auto Association San Joaquin Valley, Dave Atherton, Chapter President Electric Auto Association, Jerry Pohorsky, Silicon Valley Chapter President EV Nirvana and Inland Empire Electric Vehicle Association, Michelle Pierce, EV Driver since 2012 GreenLatinos, Andrea Marpillero-Colomina, Clean Transportation + Energy Lead Indivisible East Bay, Larry Baskett, Governing Committee Member Indivisible Ross Valley, Sue Saunders, Founder Indivisible Sonoma County, Tom Benthin, Indivisible Sonoma County Advisory Council Member Interfaith Climate Action Network of Contra Costa County, Rev. Will McGarvey, Exec. Director Interfaith Power & Light, Susan Stephenson, Executive Director Long Beach Alliance for Clean Energy, Dave Shukla, Operations Marin/Sonoma EV Squad, David Moller, P.E. Menlo Spark, Diane Bailey, Executive Director Mothers Out Front California, Alicia Nichols-Gonzalez, California Organizing Manager Mothers Out Front Capital Region, Adelita Serena, Capital Region Organizer Mothers Out Front Fresno, LaTisha Harris, Fresno Community Organizer Mothers Out Front San Francisco, Maia Piccagli, Volunteer Leader Mothers Out Front Silicon Valley, Jenny Green, Volunteer Leader Novasutras, Michelle Merrill, Founder Ocean Outfall Group, Joseph Racano, Director Peninsula Interfaith Climate Action, Debbie Mytels, Chair Project Green Home, Kate Kramer, MD, Co-Founder, EV driver running on PV since 2007 Resource Renewal Institute, Chance Cutrano, EV Driver since 2017 San Francisco Bay Physicians for Social Responsibility, Robert M. Gould, MD, President Santa Cruz Climate Action Network, Pauline Seales, Organizer So. Bay Interfaith Power & Light, Rani Fischer, EV driver since 2017 Sustainable Silicon Valley, Jennifer Thompson, Executive Director The Climate Center, Woody Hastings, Energy Program Manager The Climate Reality Project California State Coalition, Antonina Markoff, Coordinator and LEED AP BD+C Architect Transition Sonoma Valley, Tom Conlon, Editor Union of Concerned Scientists, Sam Houston, Senior Analyst Unitarian Universalist Church of Palo Alto, Green Sanctuary Committee, Kevin Ma, ChairNorth

#### Companies:

Atmos Financial, PBC, Ravi Mikkelsen CEO

BeniSol, LLC, Sven Thesen, Founder, EV driver running on PV since 2007 California Solar Electric, Tom Burt GoPowerEV Inc, John Reister, CEO Green Building Architects, Bill Wolpert, Architect and EV driver since 2011 Horse Opera Productions, Vanessa Warheit, Producer, award-winning video Worse Than Poop!

Infomax Solutions, Mike Molavi, EV driver JRP Charge, Joel Pointon, Principal Laura Stokes Online Art Sales and Gallery, Debra Stokes, Retired Engineer, Want to Drive an EV Modern Home Services, INC, Hamed Kazemi, Business Professional Natural Resources Law, Rene Voss, Attorney and EV Driver since 2018 npc Solar, Nicholas Carter, PhD, Founder and Owner, EV driver for 20 years Orange Charger Inc, Nicholas Johnson, CEO Peevers Consulting Services, Alan Peevers, Owner Récolte Energy, Gopal Shanker, President Unplugged Performance, Ben Schaffer, CEO

Individuals:

A-Kwun Wong, EV Driver since 2012

Alan Solomon, Lead Generation/Sales EV Charging Access For All Alex Wang, EV driver since 2016

Alison Sullivan, Aspiring EV driver Allison Davis, Non Profit Program Director Allison Kenneth, EV

Driver since 2009 Amy Zucker Morgenstern, Minister, Unitarian Universalist Church of Palo Alto

Andrew Reich, EV Driver since 2015 Andrew Wilder, CEO and EV Driver since 2013 Andy Carman, Dr.

Ann Harvey, Physician and EV driver

Anthony DiSalvo, Network Engineer

Arthur Keller, EV Driver since 2001

Barbara A Ballenger, EV Driver since 2018 Barbara DiSalvo, Retired Ben Zuckerman, EV driver since

2011 Beth DeVincenzi, Retired Bettina Hughes, MSc Bill DeVincenzi, Retired CFO and University

Professor Bill Hilton, Retired HR Mgr Bill Montgomery Brett Havener, Network Engineer Bruce

Naegel, Board, Carbon Free Silicon Valley Bruce Nixon Carol Long, EV driver since 2005 Carol Vollen

Chadwick Manning, Renewable Energy Technology Entrepreneur & Project Developer Chance

Cutrano, Town Councilmember, Town of Fairfax Chase Dixon, Active Duty Navy Chris Gilbert, EV

Driver Christine Sullivan, EV Driver Claire Broome, Professor of Public Health Colby Allerton, Real

estate manager Colin Finnegan, Researcher Colin Gould, EV owner since 2018, tech worker Cor van

de Water, EV driver since 2005 Courtney Parks, Renter in Multi-Family Housing, Aspiring EV Driver

Craig Drizin, Engineer Craig Gordon, Fire Department Paramedic Dan Ellecamp, Retired Financial

Analyst Danny Boardman, Military member, EV driver Dave Jewett, Retired David Bezanson, Ph.D.

David Wilde, EV Driver since 2018

Dency Nelson, EV Driver since 2002/Founding Member of Plug In America Diana Nemet, EV Driver

Diane Demee-Benoit, EV Driver since 2019 Douglas Martoccia, Chief Engineer for the Global

Positioning System Dwight MacCurdy, Retired SMUD EV Project Manager Eliot Kalman, Musician

Elizabeth Pirrotta, Data Analyst Elizabeth Thagard, EV driver since 2005 Frank King, EV driver since

2017 Fred Bamber, CEO Grace DelValle, EV Driver of 2013 Prius Plug-in & 2017 E-Golf Hilary Bates

AIA, Architect Howie Schneider, Rabbi Hugh Williams, EV owner in multi-family housing Ian

McCullough, EV Driver since 2018 Igor Tregub, Co-Chair, Sierra Club SF Bay Energy-Climatic

Committee; Volt driver and multi-family housing resident Isaac Mankita, EV Driver since 2017 Jack

Labbe, EV Activist James Higbie, Physicist James Hosner, EV Driver since 2020 Janet Parks, EV driver

since 2017 Janet Perlman, Physician Jeffrey Bradt, EV Driver in an apartment Jennifer Heggie, EV

driver since 2011 Jessica Craven, EV driver since 2014 Jill Jensen, EV driver since 2003 Jim Stewart

Joe Houde, Consultant Joe Siudzinski, Retired Engineering Director Joel Leong, Retired Engineer &

Enthusiastic EV Driver John Donnelly, Retired Economist John Dymesich, Engineer John Love, EV

Driver since 2014 Jonathan Cano, Engineer Jorge Ruiz, New EV driver Kamal Prasad Kate Sawtell,

Student Kelly Lyndon, EV Driver Kendra Fadil, EV driver since 2013 Kenneth Forward, Community

Advocate/Engineer Kenneth Hansen, Retired Engineer Kerry Skemp, ChargePoint employee, EV

driver since 2017 Lance Pompe, Student Laura Simpson, Retired Laurens Vaneveld, PE and EV driver

since Jan 2013 Laurie-Ann Barbour, Multi Family housing dweller and EV driver Leane Eberhart,

Architect Linda Henigin, EV Driver since 2011 Lisa Williams, EV driver since 2019 Lyle Predmore,

Retired Clergy Mahlon Dormon, EV Driver since 2015 Marc Silverman Margaret Brosnan, EV driver

Mark Bernstein, Physician, PHEV driver since 2016 Mark Hall, Retired public library manager Mark

Williams, EV driver since 2011 Marsha Jarvis, EV Driver Matthew Vis, Aerospace Engineer Megan

Shumway, Retired RNC/PHN Michael Kutilek, Professor Emeritus, EV Driver since 2013 Mike

Richards, EV Driver Mike Trivich, Retired Electrical Engineer Miles Hookey, Teacher, San Jose Unified School District Moria Paz, JD, Mother, EV Driver since 2017 Nalin Nanayakkara, Physician, EV driver since 2010 Nancy Andon, Scientist Nancy Neff, RN, EV driver since 2016 Nicholas Ratto, Retired Pharmacist Norma Williamson, EV Driver since 2001 Olivier Kempf, EV driver since 2018 Pat Lang, Retired Patricia Kinney, Retired Software Engineer Patricia Ravit, EV driver Patrick Reid, EV Driver since 2017 Paul Spitsen Paul Zurmuhle, Project Manager Peter Cross, Retired Engineer Peter Hellwig, Concerned citizen Peter Kozodoy, PhD, Dad, Clean Tech Entrepreneur, EV driver since 2017 Philip Morton, Retired software engineer Randy Carrico, EV driver since 2019 Ravi Mikkelsen, EV driver since 2011 Rebecca Milliken, City of El Cerrito Environmental Quality Committee Member Richard Baldwin, Retired Air Pollution Control Officer Richard Leonard Richard Oelerich, EV driver since 2016, and father Richard Star, Owner/Driver of multiple EVs since 2014 Rick Castellini, EV Driver since 2016 Robin Mitchell, Software developer Roland Saher, Retired teacher Rolf Schreiber, EV Driver and advocate since 2008 Ron Freund, EV driver since 1998 Sally Ahnger, EV Driver since 2002 Sara Katz, Dr.

Sarah Corr, EV driver since two months ago Scott Kostka, Retired Engineer, 4 year EV driver Sheila Tarbet, Retired Sherry Boschert, EV Driver since 2002 Shirley Johnson, EV driver since 2016 Sonja Marwood, EV Driver since 2014 Soraya Moham, Educator Steffen Rochel, EV Driver Stephanie Hellman, Vice Mayor, Town of Fairfax Stephanie Morrris, Landscape Architect, EV driver, climate volunteer steve yano, EV Driver since 2017 Steven Kalogeras, EV Driver since 2021 Sybil Cramer, Secretary, Silicon Valley Electric Auto Assoc Tara Mills, Fundraising Manager Terry Godfrey Thom Filipel, EV driver Tina Brenza, Dentist, EV driver since 2011 Tina Juarez, EV driver since 2003 Tom Goldfarb, EV Driver Tom Graly, EV driver since 2016 Tom Kabat, Environmental Quality Commissioner, Menlo Park Tom Kunhardt, EV driver since 2015 powered by solar PV Tyler Hall, EV enthusiast and apartment dweller Vadim Goziker Vickie Randle, EV driver since 2008 Victoria Lea, EV Owner/Driver Virginia Patch, EV Driver since 2020 Virginia Van Kuran, Volunteer for the environment Waidy Lee, EV driver since 1999, retired Engineer Wei-Tai Kwok, Lafayette City Council Member Wendy Ring, Physician, EV Driver Willard Alldis, EV driver William Arnett, Voter William Kendall Rothaus, Retired Xintian Eddie Lin, Principal Engineer, EV driver since 2016

9 Point Criteria Info:

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