

**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 8:14:34 PM

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Commenter Contact Information

Name: Vanessa Warheit

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

Representing: Plug In America, Acterra, Union of Concerned Scientists Mailing Address Number and Street:

City:

State:

Zip Code:

Telephone #:

Email: [vwarheit@gmail.com](mailto:vwarheit@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.

We appreciate the opportunity to comment on the final draft CALGreen building codes for EV infrastructure in new residential buildings. This draft is virtually identical in content to the preceding proposed CALGreen 2022 building code, and does nothing to address the comments that our coalition submitted to you during the 45-day public comment period ending on September 27, 2021. We are submitting a separate letter reiterating the substance of our requests, asking you to address long-standing inequities in the code for residents of multi-family housing.

This letter addresses the alarming fact that your agency appears to have omitted from the public record at least 2,373 comments sent to your office from individual members of our coalition, during the previous CALGreen 2022 (45-day) public comment period ending on September 27, 2021.

We are extremely concerned that your agency doesn't seem to be taking this public comment period seriously. Not only have you misplaced an enormous number of comments, but since our groups noticed that they were missing, and followed up with your agency on October 19, 2021, we have not been informed of any investigation or corrective action taken.

We would therefore like to know what actions the agency is taking to:

- \* identify where the problem occurred
- \* recover any other lost public comments
- \* take these comments, their loss, and the possible loss of others into account in the current rule-making process.

In correspondence with Michael Nearman and Laura Mills, DGS claims not to have received either the 2,046 emails sent by supporters of the Union of Concerned Scientists, nor the 327 emails sent by members of Plug In America, during the 45-day public comment period. For the record, these comments are viewable at the links below:

A record of 327 emails sent from members of Plug In America can be accessed here:

[https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdocs.google.com%2Fspreadsheets%2Fd%2F1o1kscSfItmcKwTMLYZiUy4Tqj1tz2vEWt\\_pjv7mWIWo%2Fedit%23gid%3D0&data=04%7C01%7CCBSC%40dgs.ca.gov%7C1b2f2dfa81ce44a420ce08d99a8a3a85%7Cea45f7b107d749a8b8f537136ec9382d%7C0%7C0%7C637710740744176220%7CUnknown%7CTWFpbGZsb3d8eyJWljoic4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IkhhaWwiLCJXVCi6Mn0%3D%7C1000&sdata=SdvhCpHLDBG9AfMSEgYthlixgldzL9c3ctuo3l7haYM%3D&reserved=0](https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdocs.google.com%2Fspreadsheets%2Fd%2F1o1kscSfItmcKwTMLYZiUy4Tqj1tz2vEWt_pjv7mWIWo%2Fedit%23gid%3D0&data=04%7C01%7CCBSC%40dgs.ca.gov%7C1b2f2dfa81ce44a420ce08d99a8a3a85%7Cea45f7b107d749a8b8f537136ec9382d%7C0%7C0%7C637710740744176220%7CUnknown%7CTWFpbGZsb3d8eyJWljoic4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IkhhaWwiLCJXVCi6Mn0%3D%7C1000&sdata=SdvhCpHLDBG9AfMSEgYthlixgldzL9c3ctuo3l7haYM%3D&reserved=0)

A record of 2,046 emails sent from members of the Union of Concerned Scientists can be accessed here:

<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdocs.google.com%2Fspreadsheets%2Fd%2F1ti3kyCrsT1rOffoXxlwH4F3RP3RzLwtB%2Fedit%3Fusp%3Dsharing%26ouid%3D110473534549292210917%26rtpof%3Dtrue%26sd%3Dtrue&data=04%7C01%7CCBSC%40dgs.ca.gov%7C1b2f2dfa81ce44a420ce08d99a8a3a85%7Cea45f7b107d749a8b8f537136ec9382d%7C0%7C0%7C637710740744176220%7CUnknown%7CTWFpbGZsb3d8eyJWljoic4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IkhhaWwiLCJXVCi6Mn0%3D%7C1000&sdata=lqW8ycnvMGzqDdpsqBlhn4FQpBg0xuNo26ZOdXlsqos%3D&reserved=0>

Sincerely,  
Marc Geller, Plug In America  
Vanessa Warheit, Acterra  
Coreen Weintraub, Union of Concerned Scientists

Note: this letter is also being submitted via email to [cbcs@dgs.ca.gov](mailto:cbcs@dgs.ca.gov)

9 Point Criteria Info:  
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