

An Open Letter to the Building Standards Commission:  
Comments on the Proposed Revised 2022 CALGreen Building Code  
for Light Duty Electric Vehicle Charging Infrastructure

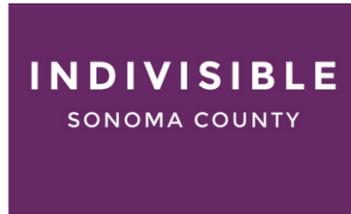


Charge Across Town™

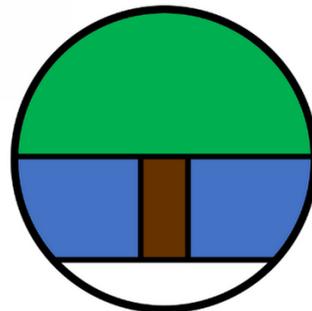




**GREENLATINOS**



LONG BEACH ALLIANCE FOR CLEAN ENERGY



**Novasutras**



OCEAN OUTFALL GROUP





The Climate Reality Project  
CALIFORNIA STATE COALITION



Climate Equity  
Policy Center



Green Sanctuary  
Unitarian Universalist  
Church of Palo Alto



October 28, 2021

BUILDING STANDARDS COMMISSION

2525 Natomas Park Drive, Suite 130 Sacramento, California 95833-2936

Via Email: [cbsc@dgs.ca.gov](mailto:cbsc@dgs.ca.gov)

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**<sup>1</sup>. 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:

- 1. Increase the residential EV Ready percentage from 25% to 85%**
- 2. Increase the number of EV spaces to 20% EV Ready and 30% EV Capable for all Non-Residential sites**

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<sup>1</sup> The economic and environmental assessment also found that the coalition proposal had a shorter payback period and a higher internal rate of return than that proposed by HCD.

3. **Return missing ALMS language to Non-Residential CALGreen, and remove the 'clarifying' ALMS language from this version**
4. **Include prominent signage at all EV Capable/EV Ready parking spaces**
5. **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-Climate 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 Morris, 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