



**BUILDING STANDARDS COMMISSION**  
**2525 Natomas Park Drive, Suite 130**  
**Sacramento, CA 95833-2936**  
**Via Email: [cbsc@dgs.ca.gov](mailto:cbsc@dgs.ca.gov)**

September 28, 2021

RE: CALGreen New Construction, Electric Vehicle Infrastructure -- Recommendations from RMI

Dear Building Standards Commissioners and Staff,

RMI is an independent, non-partisan, non-profit organization of experts across disciplines working to accelerate the clean energy transition and improve lives. Our Carbon-Free Mobility team focuses specifically on accelerating decarbonization of the on-road transportation sector.

As of 2019, transportation made up approximately 40% of California's total greenhouse gas (GHG) emissions – the single largest contribution from any sector.<sup>1</sup> Light-duty passenger vehicles are responsible for the lion's share of these emissions, contributing over 70% of the sector's total, or 29% of the state's annual GHG emissions.

The only meaningful strategy to achieve California's goals to reduce carbon emissions from the transportation sector by 2030 is through vehicle electrification. This broadly understood reality is driving major policy, industry, and fleet stakeholders to mandate and/or commit to 100% electric vehicle (EV) sales in the 2030-2035 timeframe, including the goals of critical stakeholders such as the state of California itself, General Motors, Volvo, Uber, Lyft, and many others. Hundreds of billions of dollars are being invested in this market and we are now looking at a future that will see EVs in every garage, driveway, parking lot, and fleet depot – much sooner than ever thought possible. Furthermore, given that the lifespan of newly built houses, condos, and apartments can easily exceed 50 years, it's critical that today we anticipate tomorrow's needs for charging EVs at all residences, including homes in low- and moderate-income communities. Avoiding the much higher costs of retrofitting residences for EV charging is critical to achieving both California's climate goals and ensuring equitable access to EVs across all income levels.

Accordingly, RMI supports an increase in the CALGreen code for residential *EV Ready* parking spaces at newly constructed multi-unit dwellings, from the currently proposed 25% up to 85%. This increase – along with the currently proposed 10% *EV Capable* and 5% installed charger requirements in this code update cycle – form a critical step in achieving universal home charging access. Ubiquitous home charging will be necessary to ensure equity and compliance with Governor Newsom's Executive Order [N-79-20](#), which requires that by 2035, all new cars and passenger trucks sold in California be zero-emission vehicles.

We hope that the Commission will consider this request as it finalizes the 2022 code cycle.

Sincerely,

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<sup>1</sup> California Air Resources Board. California Greenhouse Gas Emissions for 2000 to 2019: Trends of Emissions and Other Indicators. July 28, 2021. Available at: [https://ww3.arb.ca.gov/cc/inventory/pubs/reports/2000\\_2019/ghg\\_inventory\\_trends\\_00-19.pdf](https://ww3.arb.ca.gov/cc/inventory/pubs/reports/2000_2019/ghg_inventory_trends_00-19.pdf).