

**From:** [B. Rasine](#)  
**To:** [CBSC@DGS](mailto:CBSC@DGS)  
**Cc:** [Michelle Pierce](#)  
**Subject:** RE: 45-Day Comment Period, NOPA, Multifamily Resident Comments  
**Date:** Monday, May 15, 2023 9:58:34 PM

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California Building Standards Commission Attention: Public Comments  
2525 Natomas Park Drive, Suite 130  
Sacramento, CA 95833

RE: 45-Day Comment Period, NOPA, Multifamily Resident Comments

Dear California Building Standards Commission Members,

We are two residents here in the State of California whose lived experience with electric vehicles (EVs) represent that of thousands of other EV drivers. We would like to share our stories in direct reference to the recent HCD Notice of Proposed Action (NOPA) as we find it lacking in certain critical elements.

### **Our EV stories**

Michelle and I have known each other for nearly a year now, sharing a mutual personal and professional passion for electric vehicles and clean energy. Michelle lives in Southern California; I'm up in the San Francisco Bay Area. We both live in multi-family housing (MFH)—Michelle in the Inland Empire Region, specifically Jurupa Valley in a senior citizen apartment complex, and I'm in a residential apartment community in Sunnyvale.

Michelle has been driving electric since 2012, when she leased a Nissan LEAF. She justified the expense at the time because gas was costing her over \$500/month, and her payments on the LEAF were about the same. She charged with the Level 1 charger that came with the car and it worked easily because she owned a house at the time. Now she drives a Chevy Bolt, still saving a ton of money but because she now lives in an apartment complex, charging is inconvenient and expensive because she needs to use public charging.

On my end, I've been driving an EV since late 2020. This has been a conscious decision for my family. We want to be able to do our part in safeguarding our environment and weaning the economy off fossil fuels. I don't miss the fumes in my garage from my previous gas-powered car. I will never go back to a gas-powered car, no matter how fancy or fast.

### **Our comments on NOPA**

We appreciate all efforts currently underway at the state as well as local levels to mandate

100% EV charging equity for California's residents. To that point however, we are surprised at the lack of reference to the people who are directly and materially impacted by public policies supporting EV infrastructure. ***In this case, that would be us, the residents of multifamily housing.*** EVs are purchased, operated, and owned by people like us. And, having an EV is just one half of the equation—charging the EV is the other. In the NOPA, there is essentially no mention of MFH residents and the impacts that EV driving can have on how we spend money and our time.

This Notice does not mention or include the numerous benefits that electric vehicles bring to the residents of MFH, namely:

- **Cost savings:** Rough calculations for me yield about \$1,080 per year in savings over my prior gasoline vehicle. In addition, the money I used to have to spend annually on maintenance for my gas-powered car, is money I am now saving as the maintenance costs for an EV are minimal.
- **Time savings:** When I charge at or near my home, I save time driving to/from gas stations, as well as the time I used to spend pumping gas or waiting for other cars to finish pumping. It is important to note that these time savings evaporate when an EV driver is unable to charge at home, and is instead forced to rely on off-home public charging stations. Public charging infrastructure is also needed, but is more relevant for road trips or longer trips, not everyday routine charging. I am also saving time by not having to visit my mechanic (and arrange for alternate transportation) every few months for oil changes, tune-ups and other maintenance that gas-powered cars require.
- **Health benefits:** As stated in the NOPA, driving an EV has significant benefits over driving a fossil fueled vehicle including no tailpipe emissions plus those emissions from the various forms of fossil fuel processing, production and transportation.

At the bottom of page 5 in the Notice, the text references the annual greenhouse gas emissions reductions estimated by CARB. We would like to stress that in addition to reducing overall greenhouse gas emissions, a switch to EV also provides time and cost savings to residents, on top of the health benefits as stated above. It is important to take all of these benefits into consideration, especially those as direct and personal as money, time, and health.

Similarly, on page 6 under item D, "The benefits of the regulation to the health and welfare of California residents, worker safety, and the state's environment" it states that

"This proposal increases the sustainability of California's natural resources and promotes public health by reducing petroleum-based automotive fuel use, GHG emissions, and

criteria pollutants.”

To this we would also like to add the above-outlined time and cost savings and benefits.

Thank you for your time and consideration.

Sincerely,

Birgitte Rasine and Michelle Pierce