

May 1, 2023

To: Mia Marvelli, Executive Director
California Building Standards Commission
2525 Natomas Park Drive, suite 130
Sacramento, CA 95833

Dear Ms. Mia Marvelli,

The California Air Resources Board (CARB) supports the proposal to increase the percentages of required Electric Vehicle (EV) Ready and Level 2 electric vehicle supply equipment (EVSE) in newly constructed multifamily dwellings, hotels, and motels, resulting in 50% of required parking spaces having EV charging capabilities.

Executive Orders B-16-2012 and B-48-2018 set targets to achieve over 1.5 million zero-emission vehicles (ZEVs) on the road by 2025 and 5 million ZEVs by 2030. California's Advanced Clean Cars II regulation implements the directives of Executive Order N-79-20, which requires that 100 percent of new car sales be ZEVs and plug-in hybrid electric vehicles (PHEVs) by 2035. CARB estimates that there will be 5.7 million ZEVs and PHEVs on the road by 2030, and 12.6 million by 2035. California is rapidly moving forward to enable the deployment of widespread zero-emission vehicles and ensuring that charging infrastructure does not present a barrier to adoption.

The California Energy Commission (CEC) reports that significant development of electric charging infrastructure is required in the coming years to support a growing ZEV fleet in California. In the CEC's AB 2127 report, staff identified a need for approximately 180,000 to 268,000 Level 1 and Level 2 chargers in multifamily dwellings to support 5 million vehicles on the road by 2030. Insufficient charging infrastructure will impact the ability of multifamily dwelling residents to successfully switch to ZEVs. Approximately one-third of California's population lives in multifamily dwellings, and most ZEV drivers that have returned their vehicles cited a lack of charging availability. While federal and State funding is available, funding alone is not enough to meet the scale of charging required to support 5 million ZEVs. The Department of Housing and Community Development's (HCD) code proposal requiring 40% of spaces to have low power Level 2 receptacles (EV Ready) and 10% of spaces to have Level 2 EVSE in multifamily, hotels, and motels will help address this gap.

Providing both EV Ready spaces and Level 2 EVSE gives drivers the opportunity to charge their vehicle in the way that meets their needs. EV Ready spaces supply drivers with a slower charge and may be more suitable for drivers who have short commute distances, prefer to charge daily, or charge at workplaces. Level 2 EVSE supply drivers with a faster charge and can meet the needs of drivers who have traveled long distances or those who prefer to charge when their vehicle battery is significantly depleted. Furthermore, parking facilities in multifamily dwellings, hotels, and motels serve residents, staff, and guests who have their

own varied charging needs. It's critical that California's EV charging policies continue to provide solutions for the wide array of EV drivers.

For these reasons, CARB supports HCD's requirements that newly constructed multifamily dwellings have EV Ready spaces and Level 2 EVSE. The ability to charge at home has been shown to be a strong driver for electric vehicle adoption, and most single-family homeowners can charge at home. Home charging is a convenient option since drivers do not have to change their commute to recharge. Furthermore, home charging may be less expensive than relying on public charging stations for recharging. The requirements proposed by HCD help make home charging a reality for residents of multifamily dwellings.

Charging availability in multifamily dwellings is also an equity issue since all newly constructed single-family homes are EV capable (having the necessary raceway and panel capacity to support a Level 2 EVSE). HCD's residential code goes beyond the single-family EV requirements by mandating the installation of EV Ready spaces and Level 2 EVSE. These requirements provide greater capability and charging readiness than the EV capable minimum standard for single-family homes. HCD's code proposal provides multifamily dwelling residents with the same convenience and potential cost-savings of home charging that single-family residents enjoy.

CARB similarly supports HCD's requirement of EV Ready and Level 2 EVSE for newly constructed hotels and motels. Providing charging at these destination locations may provide similar benefits as home charging. Hotel and motel guests would have the convenience of being able to charge at a hotel or motel instead of being forced to charge at a public Level 2 EVSE or DCFC. EV Ready spaces can provide workplace charging to the hotel or motel employees. Additionally, charging at the hotel and motel may have some cost-savings when compared to using a publicly available charger.

Given the rapid transition to zero-emission vehicles and the critical role that infrastructure installation will play, CARB strongly supports HCD's CALGreen requirements that newly constructed multifamily dwellings, hotels, and motels provide EV Ready and Level 2 EVSE for residents, staff, and guests. HCD's work is vital to meeting California's ZEV goals and the State's air quality and climate goals.

If you have any questions or need further information, please contact Analisa Bevan, Zero Emission Infrastructure Specialist at analisa.bevan@arb.ca.gov or (279)-208-7172.

Sincerely,



Analisa Bevan, Zero Emission Infrastructure Specialist

cc: Adrienne Harris

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