

From: [Dennis Corelis](#)
To: CBSC@DGS
Subject: Public Comment on Proposed Building Standards - Appendix A4 Residential Voluntary Measures, Section A4.106.8.2 New multifamily development projects and hotels and motels.
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Proposed Building Standard: Title 24 Part 11, Chapter 4 Residential Mandatory Measures, **Appendix A4 Residential Voluntary Measures, Section A4.106.8.2 New multifamily development projects and hotels and motels.** This comment is for review during the 45 Day Comment Period, HCD ITEM 14.

On behalf of the Electric Vehicle Charging for All Coalition (EVCAC) Leadership Team, I am providing this comment on the 45- Day Express Terms proposed by the Department of Housing and Community Development (HCD) for the 2022 California Green Building Standards Code, California Code of Regulations, Title 24, Part 11 (HCD 04/22).

We recommend **Approve As Amended** based on Criterion 6 of the Health and Safety Code Section 18930(a) as follows:

ITEM 14 Appendix A4 Residential Voluntary Measures, Section A4.106.8.2 New multifamily development projects and hotels and motels.

- There are seven (7) instances of the following language that provide relief from the requirements in the Exceptions of this Section:
 - **“Exception:** Areas of parking facilities served by parking lifts,

including but not limited to automated mechanical-access open parking garages as defined in the California Building Code; **or parking facilities otherwise incapable of supporting electric vehicle charging**” (emphasis added).

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There is no guidance as to what would make a parking facility “otherwise incapable of supporting electric vehicle charging.” To preclude the highlighted language being used to avoid compliance with the intent of the code, it should be either clarified to provide guidance to applicants and building officials or deleted as shown in our suggested revised language under Item 6 of the Health and Safety Code Section 18930(a) criteria, which requires that “*The proposed standard is not unnecessarily ambiguous or vague, in whole or in part.*” Our suggested amended language for Item 14 is as follows:

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“Exception: Areas of parking facilities served by parking lifts, including but not limited to automated mechanical-access open parking garages as defined in the California Building Code.

Situations where the proposed parking facilities are truly “. . . incapable of supporting electric vehicle charging” should continue to be handled on a case-by-case basis upon the review and concurrence of the local building official.