

From: [Dennis Corelis](#)
To: CBSC@DGS
Subject: Public Comment on Proposed Building Standards - 4.106.4.3 Electric vehicle charging for additions and alterations of parking facilities serving existing multifamily buildings.
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Commenter Contact Information

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Date: **5/10/2023**

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Proposed Building Standard: Title 24 Part 11, Chapter 4 Residential Mandatory Measures, Section 4.106.4.3 Electric vehicle charging for additions and alterations of parking facilities serving existing multifamily buildings. This comment is for review during the 45 Day Comment Period, HCD ITEM 12.

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 Criteria 3 and 6 of the Health and Safety Code Section 18930(a) as follows:

- HCD has eliminated the use of EV CAPABLE spaces in new construction, see Item 5 of this Rulemaking, which sets forth HCD's ". . . concurrence that EV capable parking spaces do not provide an actual or immediate opportunity for EV charging." Criterion 6 requires proposed standards not to be "unnecessarily ambiguous or vague". The current language creates ambiguity through its conflict with the requirements for new construction. Additionally, the public interest requires EV charging to be provided in existing multifamily developments over time; EV Capable spaces that cannot readily be upgraded by tenants who need EV charging at home do not serve the public interest as required by Criterion 3.
- We believe the continuation of EV Capable in Item 12 was an oversight. In accordance with Criteria 3 and 6 of the Health and Safety Code Section

18930(a) we request the proposal be approved amended as follows :

4.106.4.3 Electric vehicle charging for additions and alterations of parking facilities serving existing multifamily buildings. ~~When~~ Where new parking facilities are added, or electrical systems or lighting of existing parking facilities are added or altered and the work requires a building permit, ten (10) percent of the total number of parking spaces added or altered shall be electric vehicle charging spaces (EV spaces) ~~capable of supporting future with~~ Low Power Level 2 EVSE receptacles.