

**FINAL STATEMENT OF REASONS  
FOR PROPOSED BUILDING STANDARDS  
OF THE CALIFORNIA DEPARTMENT OF HOUSING AND COMMUNITY  
DEVELOPMENT  
REGARDING THE 2025 CALIFORNIA GREEN BUILDING STANDARDS CODE  
CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 11  
(HCD 04/24)**

The Administrative Procedure Act requires that every agency shall maintain a file of each rulemaking that shall be deemed to be the record for that rulemaking proceeding. The rulemaking file shall include a Final Statement of Reasons. The Final Statement of Reasons shall be available to the public upon request when rulemaking action is being undertaken. The following are the reasons for proposing this rulemaking action:

**UPDATES TO THE INITIAL STATEMENT OF REASONS:**

Government Code Section 11346.9(a)(1) requires an update of the information contained in the Initial Statement of Reasons. If the update identifies any data or any technical, theoretical or empirical study, report, or similar document on which the state agency is relying that was not identified in the Initial Statement of Reasons, the state agency shall comply with Government Code Section 11347.1.

The Department of Housing and Community Development (HCD) has not added any data (including technical, theoretical, or empirical studies, reports, or similar documents relied upon) that would necessitate an update of the information contained in the Initial Statement of Reasons.

**MANDATE ON LOCAL AGENCIES OR SCHOOL DISTRICTS**

Pursuant to Government Code Section 11346.9(a)(2), if the determination as to whether the proposed action would impose a mandate, the agency shall state whether the mandate is reimbursable pursuant to Part 7 of Division 4. If the agency finds that the mandate is not reimbursable, it shall state the reasons for the finding(s).

HCD has determined that the proposed regulatory action would not impose a mandate on local agencies or school districts.

**OBJECTIONS OR RECOMMENDATIONS MADE REGARDING THE PROPOSED REGULATION(S).**

Government Code Section 11346.9(a)(3) requires a summary of EACH objection or recommendation regarding the specific adoption, amendment, or repeal proposed, and an explanation of how the proposed action was changed to accommodate each objection or recommendation, or the reasons for making no change. This requirement applies only to objections or recommendations specifically directed at the agency's proposed action or to the procedures followed by the agency in proposing or adopting the action, or reasons for making no change. Irrelevant or repetitive comments may be aggregated and summarized as a group.

The text with proposed changes was made available to the public during a 45-day comment period from May 17, 2024, until July 1, 2024. Furthermore, HCD and the

California Building Standards Commission held a joint public hearing to solicit additional verbal and written comments on California Green Building Standards Code (CALGreen) proposals on July 2, 2024. A total of 138 comments were received during the 45-day public comment period and public hearing. This Final Statement of Reasons includes a reference to several duplicate comments received during the 45-day comment period and hearing. HCD consolidated similar comments and corresponding responses to comments. HCD did not consider responses on non-HCD proposals or proposals not received during the specified public comment period. HCD acknowledged all the comments and responded to only the comments that pertained to the proposed amendments for the 2024 Triennial Code Adoption Cycle and those received prior to the close of the comment period. Due to the large volume of comments received on items 2, 3, 4, and 7, a complete list of signatories and commenters can be found in Attachment A.

## **COMMENTS RECEIVED DURING THE 45-DAY PUBLIC COMMENT PERIOD (May 17, 2024, until July 1, 2024)**

### **ITEM 1**

#### **Chapter 2 Definitions, Section 202 Definitions.**

HCD proposes to adopt definitions in this section to clarify terms used in section 4.106.4.4.

#### **Commenter(s) and Recommendation:**

Jared Sanchez, California Bicycle Coalition.

The commenter suggests amending the definitions to include additional accommodations for larger or longer bikes, which can include e-bikes, cargo bikes, and adaptive bikes for people with disabilities.

#### **Agency Response:**

HCD appreciates the commenter's points of view and the commenter's suggestions. HCD's proposed bicycle parking requirements are general and do not restrict the types or sizes of bicycles that may use the proposed bicycle parking provisions. HCD will consider further changes related to bicycle parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

#### **Commenter(s) and Recommendation:**

Various Commenters: Colin Fiske, Coalition for Responsible Transportation Priorities; Doug Bojack; Elaine Astrue; Jessica Heiden; Jacob Wasserman; Mimi Holt, Mike Swire, Anna Harley-Trochimczyk, and Jordan Moldow.

The commenters support the comments provided by CalBike dated June 11, 2024, and request that HCD make the changes suggested.

#### **Agency Response:**

HCD appreciates the commenter's points of view and the commenter's suggestions. HCD's proposed bicycle parking requirements are general and do not restrict the types or sizes of bicycles that may use the proposed bicycle parking provisions. HCD will consider further changes related to bicycle parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Jairo Avalos.

The commenter suggests amending the definitions to include additional accommodations for larger or longer bikes, which can include e-bikes, cargo bikes, and adaptive bikes for people with disabilities.

**Agency Response:**

HCD appreciates the commenter's points of view and the commenter's suggestions. HCD's proposed bicycle parking requirements are general and do not restrict the types or sizes of bicycles that may use the proposed bicycle parking provisions. HCD will consider further changes related to bicycle parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Hans Larsen, City of Fremont.

The commenter suggests that the CALGreen code provisions encourage that at least some percentage of the required residential and nonresidential bicycle parking facilities would be adequate to accommodate longer and larger bicycles, such as electric, cargo, child carrier, and adaptive bicycles.

**Agency Response:**

HCD appreciates the commenter's points of view and the commenter's suggestions. HCD's proposed bicycle parking requirements are general and do not restrict the types or sizes of bicycles that may use the proposed bicycle parking provisions. HCD will consider further changes related to bicycle parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Belinda Martinez Canez.

The commenter recommends that building codes include space for bike storage, so more people are encouraged to bring their e-bikes.

**Agency Response:**

HCD appreciates the commenter's points of view and the commenter's suggestions. HCD's proposed bicycle parking requirements are general and do not restrict the types or sizes of bicycles that may use the proposed bicycle parking provisions. HCD will consider further changes related to bicycle parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Justin Hu-Nguyen, Bike East Bay.

The commenter suggests amending the definitions to accommodate for e-bikes, cargo bikes, and adaptive bikes for people with disabilities.

**Agency Response:**

HCD appreciates the commenter's points of view and the commenter's suggestions. HCD's proposed bicycle parking requirements are general and do not restrict the types or sizes of bicycles that may use the proposed bicycle parking provisions. HCD will consider further changes related to bicycle parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Samantha Harris, County of Contra Costa.

The commenter suggests amending the long-term bicycle parking definition or facility provisions to expand bicycle parking spaces that can accommodate cargo bikes and electrical charging infrastructure for e-bikes.

**Agency Response:**

HCD appreciates the commenter's points of view and the commenter's suggestions. HCD's proposed bicycle parking requirements are general and do not restrict the types or sizes of bicycles that may use the proposed bicycle parking provisions. HCD will consider further changes related to bicycle parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Todd Edelman.

The commenter suggests updating bicycle parking standards (including new standards for bicycle locks, updating bicycle racks, security, and additional electric charging).

**Agency Response:**

HCD appreciates the commenter's points of view and the commenter's suggestions. HCD's proposed bicycle parking requirements are general and do not restrict the types or sizes of bicycles that may use the proposed bicycle parking provisions. HCD will consider further changes related to bicycle parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Darryl Sher.

The commenter suggests amending the definitions to accommodate for e-bikes, cargo bikes, and adaptive bikes for people with disabilities.

**Agency Response:**

HCD appreciates the commenter's points of view and the commenter's suggestions. HCD's proposed bicycle parking requirements are general and do not restrict the types or sizes of bicycles that may use the proposed bicycle parking provisions. HCD will consider further changes related to bicycle parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

## ITEM 2

### Chapter 4 Residential Mandatory Measures, Section 4.106.4.2.2 Multifamily dwellings, hotels and motels.

HCD proposes to amend the existing title to remove reference to hotels and motels and repeal subitems 1a and 2a. Additionally, HCD proposes to renumber the subitems and modify the titles with amendments to the subitems 1a-1e and 2a-2c.

#### **Commenter(s) and Recommendation:**

Danny Leung, California Energy Commission.

The California Energy Commission expresses support for the amendments made to the electric vehicle (EV) charging sections of the 2025 California Building Standards Code.

#### **Agency Response:**

HCD appreciates the commenter's support for the proposed amendments.

#### **Commenter(s) and Recommendation:**

Tobin Symmank, Architects Orange (AO). Written comment provided, and Public Hearing comment provided on July 2, 2024.

The commenter suggests amending the proposed language within section 4.106.4.2.2(2)(a) to reflect "common use unassigned" in order to distinguish from "unassigned" of prior section 4.106.4.2.2(1).

#### **Agency Response:**

HCD appreciates the commenter's points of view and the commenter's suggestions. HCD's proposed amendments and terminology have been developed collaboratively by numerous stakeholders. HCD will consider further changes related to electric vehicle charging and parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

#### **Commenter(s) and Recommendation:**

Wendy Chou, EV Charging for All Coalition; See FSOR Attachment A for a complete list of signatories and supporting commenters.

The commenter recommends that HCD modify the existing parking lift exception provisions or completely remove the exception in its entirety. Additionally, the commenter suggests editorial modifications in section 4.106.4.2.2(1)(c).

#### **Agency Response:**

HCD appreciates the commenter's points of view and the commenter's suggestions. As recommended by the Code Advisory Committee, HCD conducted a further study and contacted multiple lift manufacturers and other interested parties regarding the existing codified parking lift exemption. HCD was unable to obtain assurance of safety concerns or confirmation that parking lifts with EV charging equipment installed can comply with existing CALGreen provisions. Regarding the suggested modifications to the proposed

code language in section 4.106.4.2.2(1)(c), it was determined that the suggested modifications would create unclear regulations for the code user. HCD will consider further changes related to electric vehicle charging and parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Kelly Cunningham, Charles Kim, Jeremy Reefer; California Statewide Utility Codes and Standards Team.

The commenters support the proposed amendments in section 4.106.4.2.2 regarding EV charging coverage for multifamily unit parking spaces and allowance of automatic load management system technology for EV charger equipped spaces. The commenters recommend that HCD adopt the 40-ampere raceway capacity requirements as mandatory measures instead of as voluntary tier 1 measures for both multifamily and hotel/motel buildings.

**Agency Response:**

HCD appreciates the commenter's support, points of view and the commenter's suggestions. HCD will consider further changes related to electric vehicle charging and parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Raghav Murali, Powerflex.

The commenter supports the proposed amendments in section 4.106.4.2.2 regarding the allowance of automatic load management system to reduce the maximum required electrical capacity to 3.3kW. The commenter recommends that HCD add an additional exemption to subsections (1)(d) and (1)(e).

**Agency Response:**

HCD appreciates the commenter's support for the amendments proposed to section 4.106.4.2.2 regarding automatic load management systems. HCD will consider further changes related to electric vehicle charging and parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Dennis J. Corelis, Electric Vehicle Charging for All Coalition (EVCAC) – Public Hearing July 2, 2024.

The commenter recommends that HCD modify the existing parking lift exception provisions or completely remove the exception in its entirety. Additionally, the commenter suggests editorial modifications in section 4.106.4.2.2(1)(c).

**Agency Response:**

HCD appreciates the commenter's points of view and the commenter's suggestions. As recommended by the Code Advisory Committee, HCD conducted a further study and

contacted multiple lift manufacturers and other interested parties regarding the existing codified parking lift exemption. HCD was unable to obtain assurance of safety concerns or confirmation that parking lifts with EV charging equipment installed can comply with existing CALGreen provisions. Regarding the suggested modifications to the proposed code language in section 4.106.4.2.2(1)(c), it was determined that the suggested modifications would create unclear regulations for the code user. HCD will consider further changes related to electric vehicle charging and parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Jonathan Hart, Powerflex – Public Hearing July 2, 2024.

The commenter supports the proposed amendments in section 4.106.4.2.2 regarding the allowance of automatic load management system to reduce the maximum required electrical capacity to 3.3kW. The commenter recommends that HCD add an additional exemption to subsections (1)(d) and (1)(e).

**Agency Response:**

HCD appreciates the commenter’s support for the amendments proposed to section 4.106.4.2.2 regarding automatic load management systems. HCD will consider further changes related to electric vehicle charging and parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Michelle Pierce, Electric Vehicle for All Coalition – Public Hearing July 2, 2024.

The commenter recommends removing the parking lift exception in section 4.106.4.2.

**Agency Response:**

HCD appreciates the commenter’s points of view and the commenter’s suggestions. As recommended by the Code Advisory Committee, HCD conducted a further study and contacted multiple lift manufacturers and other interested parties regarding the existing codified parking lift exemption. HCD was unable to obtain assurance of safety concerns or confirmation that parking lifts with EV charging equipment installed can comply with existing CALGreen provisions. Regarding the suggested modifications to the proposed code language, it was determined that the suggested modifications would create unclear regulations for the code user. HCD will consider further changes related to electric vehicle charging and parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Beverly Deschaux, Electric Vehicle Association of California Central Coast – Public Hearing July 2, 2024.

The commenter expresses support for the proposed amendments in section 4.106.4.2.2 as it relates to each multifamily unit that has assigned parking with an EV Ready receptacle.

**Agency Response:**

HCD appreciates the commenter's support of the proposed amendments.

**Commenter(s) and Recommendation:**

Josh Cohen, SWITCH – Public Hearing July 2, 2024.

The commenter expresses support for the letter submitted by colleague Ben Brint and supports EV chargers for multifamily dwellings, the benefits of ALMS and encourages support for level 2 charging instead of low-power level 2.

**Agency Response:**

HCD appreciates the commenter's support, points of view and the commenter's suggestions. HCD will consider further changes related to electric vehicle charging and parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Jim Frey, 2050 Partners, IOU – Public Hearing July 2, 2024.

The commenter recommends that HCD adopt the 40-ampere raceway capacity requirements as mandatory measures instead of as voluntary tier 1 measures for both multifamily and hotel/motel buildings.

**Agency Response:**

HCD appreciates the commenter's points of view and the commenter's suggestions. HCD will consider further changes related to electric vehicle charging and parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Vanessa Warheit, EV Charging for All Coalition – Public Hearing July 2, 2024.

The commenter recommends that HCD amend section 4.106.4.2.2 (1)(c), the language describing charging receptacle requirements for assigned and unassigned parking in multifamily needs to be clarified to prevent misinterpretations of the code.

**Agency Response:**

HCD appreciates the commenter's points of view and the commenter's suggestions. HCD will consider further changes related to electric vehicle charging and parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Mal Skowron, ChargePoint, Inc. and Ben Brint, SWITCH.

The commenter recommends that HCD reduce the provisions for on-site distribution transformer capacity.



**Agency Response:**

HCD appreciates the commenter's points of view and the commenter's suggestions. HCD will consider further changes related to electric vehicle charging and parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Mal Skowron, ChargePoint, Inc. and Ben Brint, SWITCH.

The commenters recommends that HCD eliminate the mandates that EV charging spaces have dedicated circuits and be directly connected to a dwelling unit's electrical panel or meter. Additionally, the commenters suggest requiring direct wiring from a dwelling unit's panel or meter in all buildings and allow circuits to terminate in junction boxes rather than only receptacles for hotels and motels.

**Agency Response:**

HCD appreciates the commenter's points of view and the commenter's suggestions. HCD will consider further changes related to electric vehicle charging and parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Bryce Nesbitt. Written comment provided, and Public Hearing comment provided on July 2, 2024.

The commenter suggests there is no good reason to exempt any form of parking style from EV charging minimums and recommends that HCD modify the existing parking lift exception.

**Agency Response:**

HCD appreciates the commenter's points of view and the commenter's suggestions. As recommended by the Code Advisory Committee, HCD conducted a further study and contacted multiple lift manufacturers and other interested parties regarding the existing codified parking lift exemption. HCD was unable to obtain assurance of safety concerns or confirmation that parking lifts with EV charging equipment installed can comply with existing CALGreen provisions. Regarding the suggested modifications to the proposed code language, it was determined that the suggested modifications would create unclear regulations for the code user. HCD will consider further changes related to electric vehicle charging and parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**ITEM 3**

**Chapter 4 Residential Mandatory Measures, Section 4.106.4.2.6 Hotels and motels.**

HCD proposes to relocate and renumber existing requirements for hotels and motels from section 4.106.4.2.2 to newly proposed section 4.106.4.2.6 and add the exception for parking facilities served by parking lifts. Additionally, HCD proposes to relocate and

renumber the automatic load management system requirements from the voluntary measures, section A4.106.8.2, and add mandatory automatic load management system measures, under new subsection number 4.106.4.2.6 (2)(c).

**Commenter(s) and Recommendation:**

Danny Leung, California Energy Commission.

The California Energy Commission expresses support for the amendments made to the electric vehicle (EV) charging sections of the 2025 California Building Standards Code.

**Agency Response:**

HCD appreciates the commenter's support of the proposed amendments.

**Commenter(s) and Recommendation:**

Wendy Chou, EV Charging for All Coalition; See FSOR Attachment A for a complete list of signatories and supporting commenters.

The commenter recommends that HCD modify the existing parking lift exception provisions or completely remove the exception in its entirety.

**Agency Response:**

HCD appreciates the commenter's points of view and the commenter's suggestions. As recommended by the Code Advisory Committee, HCD conducted a further study and contacted multiple lift manufacturers and other interested parties regarding the existing codified parking lift exemption. HCD was unable to obtain assurance of safety concerns or confirmation that parking lifts with EV charging equipment installed can comply with existing CALGreen provisions. Regarding the suggested modifications to the proposed code language in section 4.106.4.2.2(1)(c), it was determined that the suggested modifications would create unclear regulations for the code user. HCD will consider further changes related to electric vehicle charging and parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Kelly Cunningham, Charles Kim, Jeremy Reefer; California Statewide Utility Codes and Standards Team.

The commenters support the proposed amendments in section 4.106.4.2.6 regarding the allowance of automatic load management system technology for EV charger equipped spaces. The commenters recommend that HCD adopt the 40-ampere raceway capacity requirements as mandatory measures instead of as voluntary tier 1 measures for both multifamily and hotel/motel buildings.

**Agency Response:**

HCD appreciates the commenter's support, points of view and the commenter's suggestions. HCD will consider further changes related to electric vehicle charging and parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Raghav Murali, Powerflex.

The commenter recommends that HCD remove “with receptacles” from the title of section 4.106.4.2.6 (1) EV Ready parking Spaces with Receptacles due to it being overly prescriptive and to allow for termination in a junction box rather than terminating in receptacles only. Additionally, the commenter proposes to add an exception that Level 2 EV Chargers may be installed in place of low power Level 2 EV charging receptacles.

**Agency Response:**

HCD appreciates the commenter’s points of view and the commenter’s suggestions. HCD will consider further changes related to electric vehicle charging and parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Dennis J. Corelis, Electric Vehicle Charging for All Coalition (EVCAC) – Public Hearing July 2, 2024.

The commenter recommends that HCD modify the existing parking lift exception provisions or completely remove the exception in its entirety.

**Agency Response:**

HCD appreciates the commenter’s points of view and the commenter’s suggestions. As recommended by the Code Advisory Committee, HCD conducted a further study and contacted multiple lift manufacturers and other interested parties regarding the existing codified parking lift exemption. HCD was unable to obtain assurance of safety concerns or confirmation that parking lifts with EV charging equipment installed can comply with existing CALGreen provisions. Regarding the suggested modifications to the proposed code language, it was determined that the suggested modifications would create unclear regulations for the code user. HCD will consider further changes related to electric vehicle charging and parking in future code adoption cycles.

**Commenter(s) and Recommendation:**

Jonathan Hart, Powerflex – Public Hearing July 2, 2024.

The commenter recommends that it be explicit in the code that Level 2 EV chargers can be used in place of low power Level 2 EV charging receptacles.

**Agency Response:**

HCD appreciates the commenter’s points of view and the commenter’s suggestions. HCD will consider further changes related to electric vehicle charging and parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Michelle Pierce, Electric Vehicle for All Coalition – Public Hearing July 2, 2024.

The commenter recommends that HCD modify the existing parking lift exception provisions or completely remove the exception in its entirety.

**Agency Response:**

HCD appreciates the commenter’s points of view and the commenter’s suggestions. As recommended by the Code Advisory Committee, HCD conducted a further study and contacted multiple lift manufacturers and other interested parties regarding the existing codified parking lift exemption. HCD was unable to obtain assurance of safety concerns or confirmation that parking lifts with EV charging equipment installed can comply with existing CALGreen provisions. Regarding the suggested modifications to the proposed code language, it was determined that the suggested modifications would create unclear regulations for the code user. HCD will consider further changes related to electric vehicle charging and parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Mal Skowron, ChargePoint, Inc. and Ben Brint, SWITCH.

The commenters recommends that HCD eliminate the mandates that EV charging spaces have dedicated circuits and be directly connected to a dwelling unit’s electrical panel or meter. Additionally, the commenters suggest requiring direct wiring from a dwelling unit’s panel or meter in all buildings and allow circuits to terminate in junction boxes rather than only receptacles for hotels and motels.

**Agency Response:**

HCD appreciates the commenter’s points of view and the commenter’s suggestions. HCD will consider further changes related to electric vehicle charging and parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**ITEM 4**

**Chapter 4 Residential Mandatory Measures, Section 4.106.4.3 Electric vehicle charging for additions and alterations of parking facilities serving existing multifamily buildings.**

HCD proposes to amend the existing title to add hotels and motels and modify existing requirements. Additionally, HCD proposes to repeal notes 1-2 and add an exception to the requirements, for the installation of level 1 EV charging receptacles during alterations and additions to existing parking facilities serving multifamily buildings, hotels, and motels.

**Commenter(s) and Recommendation:**

Kristian C. Corby, California Electric Transportation Coalition (CaETC), Written comment provided, and Public Hearing comment provided on July 2, 2024.

CalETC suggests that HCD amend the proposed exception in section 4.106.4.3, to allow the use of Level 1 EVSE and receptacles. In addition, the commenter recommends removing the “120-volt”, which the commenter believes unnecessarily limits the voltage that can be used. Lastly, the commenter suggests that the provision account for parking facilities that may already have installed Level 1 EV charging.

**Agency Response:**

HCD appreciates the commenter’s points of view and the commenter’s suggestions. HCD will consider further changes related to electric vehicle charging and parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Danny Leung, California Energy Commission.

The California Energy Commission expresses support for the amendments made to the electric vehicle (EV) charging sections of the 2025 California Building Standards Code.

**Agency Response:**

HCD appreciates the commenter’s support of the proposed amendments.

**Commenter(s) and Recommendation:**

Wendy Chou, EV Charging for All Coalition; See FSOR Attachment A for a complete list of signatories and supporting commenters.

The commenter suggests amending the proposed exception language to require two (2) alternative options to address both level 1 EVSE and level 1 receptacles and to ensure that existing EV Ready charging infrastructure could remain and not be unnecessarily upgraded.

**Agency Response:**

HCD appreciates the commenter’s points of view and the commenter’s suggestions. HCD will consider further changes related to electric vehicle charging and parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Kelly Cunningham, Charles Kim, Jeremy Reefer; California Statewide Utility Codes and Standards Team.

The commenters’ support the proposed amendments in section 4.106.4.3 regarding 100% coverage of EV charging for added or altered parking spaces. The commenters recommend HCD narrow the new exception for level 1 projects to be available only for multifamily buildings and to amend the exception involving level 1 charging to require level 2 readiness.

**Agency Response:**

HCD appreciates the commenter's support for the proposed amendments. HCD recognizes the commenter's points of view and the suggestions. HCD will consider further changes related to electric vehicle charging and parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Bryce Nesbitt. Written comment provided, and Public Hearing comment provided on July 2, 2024.

The commenter recommends modifying the exception in section 4.106.4.3 to avoid limiting the exception to just receptacles.

**Agency Response:**

HCD appreciates the commenter's points of view and the commenter's suggestions. HCD will consider further changes related to electric vehicle charging and parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Dennis J. Corelis, Electric Vehicle Charging for All Coalition (EVCAC) – Public Hearing July 2, 2024.

The commenter recommends amending the proposed exception in section 4.106.4.3 to require two (2) alternative options to address both level 1 EVSE and level 1 receptacles and to ensure that existing EV Ready charging infrastructure could remain and not be unnecessarily upgraded.

**Agency Response:**

HCD appreciates the commenter's points of view and the commenter's suggestions. HCD will consider further changes related to electric vehicle charging and parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Sven Thesen, Electric Vehicle Charging for All Coalition (EVCAC) – Public Hearing July 2, 2024.

The commenter recommends amending the exception in section 4.106.4.3.

**Agency Response:**

HCD appreciates the commenter's points of view and the commenter's suggestions. HCD will consider further changes related to electric vehicle charging and parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Jim Frey, 2050 Partners, IOU – Public Hearing July 2, 2024.

The commenter recommends that HCD narrow the new exception for level 1 projects to be available only for multifamily buildings and to amend the exception involving level 1 charging to require level 2 readiness.

**Agency Response:**

HCD appreciates the commenter's points of view and the commenter's suggestions. HCD will consider further changes related to electric vehicle charging and parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Guy Hall, Electric Vehicle Association – Public Hearing July 2, 2024.

The commenter recommends that HCD simplify and make the exception in section 4.106.4.3 more clear for the code user.

**Agency Response:**

HCD appreciates the commenter's points of view and the commenter's suggestions. HCD will consider further changes related to electric vehicle charging and parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Phillip Kobernick, Peninsula Clean Energy.

The commenter expresses support to the changes made to exempt Level 1 charging in section 4.106.4.3. However, the commenter recommends amending the exception language by removing the 120-volt specificity and for the provision to account for parking facilities that may already have installed Level 1 EV charging.

**Agency Response:**

HCD appreciates the commenter's points of view and the commenter's suggestions. HCD will consider further changes related to electric vehicle charging and parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Trish Davy, SMUD.

The commenter suggests that HCD amend the proposed exception in section 4.106.4.3, in order to ensure that both Level 1 EV receptacles and Level 1 EV chargers are permitted. The commenter recommends replacing the 120-volt specificity with Level 1 EV charging receptacle, adding Level 1 EVSE, and adding language that does not require Level 2 charging options to be installed at altered parking spaces that already have access to EV Charging.

**Agency Response:**

HCD appreciates the commenter's points of view and the commenter's suggestions. HCD will consider further changes related to electric vehicle charging and parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**ITEM 5**

**Chapter 4 Residential Mandatory Measures, Section 4.106.4.4 Bicycle parking.**

HCD proposes to relocate and amend existing requirements from Appendix A4.106.9 into a new section 4.106.4.4.

**Commenter(s) and Recommendation:**

Jared Sanchez, CalBike.

The commenter suggests that HCD amend section 4.106.4.4.2 "Long-Term bicycle parking for multifamily buildings", to include additional acceptable features: charging outlets and a shelf to charge battery packs, fire rated construction, flexible designs for bicycle parking, and security camera coverage. Additionally, the commenter proposes to increase the minimum ratio to at least one bike parking spot per dwelling unit in multifamily buildings.

**Agency Response:**

HCD appreciates the commenter's points of view and the commenter's suggestions. HCD will consider further changes related to bicycle parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Various Commenters: Colin Fiske, Coalition for Responsible Transportation Priorities; Doug Bojack; Elaine Astrue; Jessica Heiden; Jacob Wasserman; Mimi Holt, Mike Swire, Anna Harley-Trochimczyk, and Jordan Moldow.

The commenters support the comments provided by CalBike dated June 11, 2024, and request that HCD make the changes suggested.

**Agency Response:**

HCD appreciates the commenter's points of view and the commenter's suggestions. HCD's proposed bicycle parking requirements are general and do not restrict the types or sizes of bicycles that may use the proposed bicycle parking provisions. HCD will consider further changes related to bicycle parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Jairo Avalos.

The commenter suggests that HCD amend section 4.106.4.4.2 "Long-Term bicycle parking for multifamily buildings", to include additional acceptable features: charging



outlets and a shelf to charge battery packs, fire rated construction, flexible designs for bicycle parking, and security camera coverage. Additionally, the commenter proposes to increase the minimum ratio to at least one bike parking spot per dwelling unit in multifamily buildings.

**Agency Response:**

HCD appreciates the commenter’s points of view and the commenter’s suggestions. HCD will consider further changes related to bicycle parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Anjali Tapadia.

The commenter suggests that HCD amend section 4.106.4.4 “Short-term bicycle parking” to require high-quality racks. Additionally, the commenter suggests that HCD amend “Long-term bicycle parking” to ensure that every bike can be securely locked up on its own.

**Agency Response:**

HCD appreciates the commenter’s points of view and the commenter’s suggestions. HCD will consider further changes related to bicycle parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Tobin Symmank, Architects Orange (AO). Written comment provided, and Public Hearing comment provided on July 2, 2024.

The commenter notes that a requirement for multifamily residential is typically based upon dwelling unit count (not square feet) and would be consistent with the requirement for long-term bicycle parking.

**Agency Response:**

HCD appreciates the commenter’s points of view and the commenter’s suggestions. HCD will consider further changes related to bicycle parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Hans Larsen, City of Fremont.

The commenter suggests that the CALGreen Code provisions consider providing electric bicycle charging infrastructure for some of the required bicycle parking spaces, with policies that are similar in requirements and exceptions as outlined in the CALGreen Code provisions for vehicles.

**Agency Response:**

HCD appreciates the commenter's points of view and the commenter's suggestions. HCD will consider further changes related to bicycle parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Bryce Nesbitt. Written comment provided, and Public Hearing comment provided on July 2, 2024.

The commenter suggests that HCD require pre-wiring of modest electrical capacity for e-Bike and e-Scooter charging.

**Agency Response:**

HCD appreciates the commenter's points of view and the commenter's suggestions. HCD will consider further changes related to bicycle parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Wendy Ring.

The commenter suggests that new and remodeled building standards for multifamily housing should have at least one (1) secure bike parking space per unit, with e-bike charging capability.

**Agency Response:**

HCD appreciates the commenter's points of view and the commenter's suggestions. HCD will consider further changes related to bicycle parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Josh Kenchel.

The commenter suggests requiring one (1) bike space per bedroom, as opposed to the proposed one-half bike space per unit requirement.

**Agency Response:**

HCD appreciates the commenter's points of view and the commenter's suggestions. HCD will consider further changes related to bicycle parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Andrew Wang.

The commenter suggests that HCD add a requirement that bicycle parking be located next to building entrances and remove all exceptions to mandatory bicycle parking minimums. Additionally, the commenter recommends not setting a maximum width for car parking spots instead of a minimum width.

**Agency Response:**

HCD appreciates the commenter's points of view and the commenter's suggestions. HCD will consider further changes related to bicycle parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Eris Weaver, Sonoma County Bicycle Coalition.

The commenter suggests that HCD amend section 4.106.4.4.2 "Long-Term bicycle parking for multifamily buildings", to include additional acceptable features: charging outlets and a shelf to charge battery packs, fire rated construction, flexible designs for bicycle parking, and security camera coverage. Additionally, the commenter proposes to increase the minimum ratio to at least one bike parking spot per dwelling unit in multifamily buildings.

**Agency Response:**

HCD appreciates the commenter's points of view and the commenter's suggestions. HCD will consider further changes related to bicycle parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Darryl Sher.

The commenter suggests that HCD amend section 4.106.4.4.2 "Long-Term bicycle parking for multifamily buildings", to include additional acceptable features: charging outlets and a shelf to charge battery packs, fire rated construction, flexible designs for bicycle parking, and security camera coverage. The commenter proposes to increase the minimum ratio to at least one bike parking spot per dwelling unit in multifamily buildings. Additionally, the commenter suggests for the number of parking spots per unit, the type of parking should be clarified that all long-term spots must be horizontal on the level of the floor.

**Agency Response:**

HCD appreciates the commenter's points of view and the commenter's suggestions. HCD will consider further changes related to bicycle parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Steve Skala.

The commenter suggests that HCD amend section 4.106.4.4.2 “Long-Term bicycle to increase the minimum ratio to at least one bike parking spot per dwelling unit in multifamily buildings. The commenter suggests for the number of parking spots per unit, the type of parking should be clarified that all long-term spots must be horizontal on the level of the floor. Additionally, the commenter recommends that parking should include a sufficient number of electrical outlets to allow a reasonable number of e-bicycles to charge.

**Agency Response:**

HCD appreciates the commenter’s points of view and the commenter’s suggestions. HCD will consider further changes related to bicycle parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Jordan Moldow– Written comment provided, and Public Hearing comment provided on July 2, 2024.

The commenter supports relocating the bicycle parking short and long-term requirements from the voluntary to the mandatory measures. The commenter expresses support towards the comments provided by CalBike dated June 11, 2024, and request that HCD make the changes suggested. Additionally, the commenter recommends that HCD amend long-term bicycle parking proposal for multifamily buildings to allow at least one bicycle parking space per dwelling unit.

**Agency Response:**

HCD appreciates the commenter’s support of the proposal, points of view and the commenter’s suggestions. HCD will consider further changes related to bicycle parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Andreas Kadavanich, Bike Fremont.

The commenter identifies barriers to using bikes for transportation, such as lack of secure long-term and short-term bike parking. The commenter suggests for multifamily residential buildings, that HCD increase the minimum number of bike parking spaces by at least 1 per dwelling, not 0.5. unit.

**Agency Response:**

HCD appreciates the commenter’s points of view and the commenter’s suggestions. HCD will consider further changes related to bicycle parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Justin Hu-Nguyen, Bike East Bay.

The commenter recommends that HCD amend long-term bicycle parking proposal for multifamily buildings to allow at least one bicycle parking space per dwelling unit. Additionally, the commenter states that setting a minimum width for parking spots that have EV charging is inappropriate.

**Agency Response:**

HCD appreciates the commenter's points of view and the commenter's suggestions. HCD will consider further changes related to bicycle parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Samantha Harris, County of Contra Costa.

The commenter recommends that HCD amend long-term bicycle parking proposal for multifamily buildings to allow at least one bicycle parking space per dwelling unit. Additionally, the commenter suggests amending the long-term bicycle parking definition or facility provisions to expand bicycle parking spaces that can accommodate cargo bikes and electrical charging infrastructure for e-bikes.

**Agency Response:**

HCD appreciates the commenter's points of view and the commenter's suggestions. HCD will consider further changes related to bicycle parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Matt Simmons.

The commenter recommends that HCD amend long-term bicycle parking proposal for multifamily buildings to allow at least one bicycle parking space per dwelling unit.

**Agency Response:**

HCD appreciates the commenter's points of view and the commenter's suggestions. HCD will consider further changes related to bicycle parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Barbara Gonzalez, HPI Architecture

The commenter recommends that HCD consider senior living communities and sub-residential occupancies where residents may not likely benefit, need, and/or use amenities for bicycles. The commenter proposes for senior living and assisted living community projects be exempt from residential bicycle requirements.

**Agency Response:**

HCD appreciates the commenter's points of view and the commenter's suggestions. HCD will consider further changes related to bicycle parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**Commenter(s) and Recommendation:**

Belinda Martinez Canez.

The commenter recommends that building codes include space for bike storage, so more people are encouraged to bring their e-bikes.

**Agency Response:**

HCD appreciates the commenter's points of view and the commenter's suggestions. HCD will consider further changes related to bicycle parking in future code adoption cycles.

No changes to the FET were made as a result of this comment.

**ITEM 7**

**Appendix A4 Residential Voluntary Measures, Section A4.106.8.2 New multifamily dwellings, hotels and motels.**

HCD proposes to modify the title for Tier 1 with amendments to the existing language and repeal Tier 1 Option B and Tier 2 in its entirety. HCD proposes amended Tier 1 voluntary measure to be adopted at the local level.

**Commenter(s) and Recommendation:**

Danny Leung, California Energy Commission.

The California Energy Commission expresses support for the amendments made to the electric vehicle (EV) charging sections of the 2025 California Building Standards Code.

**Agency Response:**

HCD appreciates the commenter's support for the proposed amendments.

**Commenter(s) and Recommendation:**

Wendy Chou, EV Charging for All Coalition; See FSOR Attachment A for a complete list of signatories and supporting commenters.

The commenter recommends that HCD modify the existing parking lift exception provisions or completely remove the exception in its entirety.

**Agency Response:**

HCD appreciates the commenter's points of view and the commenter's suggestions. As recommended by the Code Advisory Committee, HCD conducted a further study and contacted multiple lift manufacturers and other interested parties regarding the existing codified parking lift exemption. HCD was unable to obtain assurance of safety concerns or confirmation that parking lifts with EV charging equipment installed can comply with

existing CALGreen provisions. Regarding the suggested modifications to the proposed code language, it was determined that the suggested modifications would create unclear regulations for the code user. HCD will consider further changes related to electric vehicle charging and parking in future code adoption cycles.

**Commenter(s) and Recommendation:**

Dennis J. Corelis, Electric Vehicle Charging for All Coalition (EVCAC) – Public Hearing July 2, 2024.

The commenter recommends that HCD modify the existing parking lift exception provisions or completely remove the exception in its entirety.

**Agency Response:**

HCD appreciates the commenter’s points of view and the commenter’s suggestions. As recommended by the Code Advisory Committee, HCD conducted a further study and contacted multiple lift manufacturers and other interested parties regarding the existing codified parking lift exemption. HCD was unable to obtain assurance of safety concerns or confirmation that parking lifts with EV charging equipment installed can comply with existing CALGreen provisions. Regarding the suggested modifications to the proposed code language, it was determined that the suggested modifications would create unclear regulations for the code user. HCD will consider further changes related to electric vehicle charging and parking in future code adoption cycles.

**Commenter(s) and Recommendation:**

Michelle Pierce, Electric Vehicle for All Coalition – Public Hearing July 2, 2024.

The commenter recommends that HCD modify the existing parking lift exception provisions or completely remove the exception in its entirety.

**Agency Response:**

HCD appreciates the commenter’s points of view and the commenter’s suggestions. As recommended by the Code Advisory Committee, HCD conducted a further study and contacted multiple lift manufacturers and other interested parties regarding the existing codified parking lift exemption. HCD was unable to obtain assurance of safety concerns or confirmation that parking lifts with EV charging equipment installed can comply with existing CALGreen provisions. Regarding the suggested modifications to the proposed code language, it was determined that the suggested modifications would create unclear regulations for the code user. HCD will consider further changes related to electric vehicle charging and parking in future code adoption cycles.

**ITEM 9**

**Appendix A4 Residential Voluntary Measures, Section A4.602 Residential Occupancies Application Checklist.**

HCD proposes to amend the above referenced section (checklist) to coordinate with proposed adopted, amended, and repealed sections in this building standards package.

**Commenter(s) and Recommendation:**

Danny Leung, California Energy Commission.

The California Energy Commission expresses support for the amendments made to the electric vehicle (EV) charging sections of the 2025 California Building Standards Code.

**Agency Response:**

HCD appreciates the commenter's support for the proposed amendments.

**COMMENTS RECEIVED THAT WERE BEYOND SCOPE OF THE 45-DAY EXPRESS TERMS**

**Comment 1  
General.**

**Commenter(s) and Recommendation:**

Diana Gardner Rich, Mayor, City of Sebastopol.

The commenter expresses support for the California Air and Resources Board (CARB) 2022 CARB Scoping Plan and encourages California to move forward with zero-emission requirements.

**Agency Response:**

HCD appreciates the feedback and recommendations provided by the commenter. Upon review, HCD has decided not to make any additional changes as the commenter's suggestions are beyond the scope of HCD's proposals and did not include discussion with all stakeholders. HCD may engage on this topic in a future code adoption cycle.

**Comment 2  
General.**

**Commenter(s) and Recommendation:**

Linda Hutchins-Knowles, EV Charging for All Coalition.

The commenter requests a formal public hearing regarding the exceptions for parking lifts included HCD's and BSC's 2025 CALGreen proposals.

**Agency Response:**

HCD acknowledges the request for a public hearing regarding the 45-day amendments to the 2025 CALGreen. HCD, in coordination with BSC, held a joint public hearing on July 2, 2024.

**Comment 3  
General.**

**Commenter(s) and Recommendation:**

Bryce Nesbitt, Obviously Enterprises; Rajeev Aswal, Robotic Systems; Mike Jones, Klaus Multiparking USA; Scott Bradford, Harding Autopark Systems/Harding Steel; Ernesto Chavarria, The Trivial Company; Santiago Rios, Stack Mobility; Jonathan Hardy, Lödige USA Inc.; Grant Shipway, Parkworks Mechanical Systems; Raul Rodriguez, Utron Parking; Raymond Kahue, Parkmatic; David LoCoco, Watry Design Incorporated. Bernardo Mendez, Volley Automation (*from Nesbit email*)



The commenters recommend that HCD exempt mechanical access parking from section 4.106.4.2.2.1.

**Agency Response:**

HCD appreciates the feedback and recommendations provided by the commenters. Upon review, HCD has decided not to make any additional changes as the commenter's suggestions are beyond the scope of HCD's proposals and did not include discussion with all stakeholders. HCD may engage on this topic in a future code adoption cycle.

**Comment 4  
General.**

**Commenter(s) and Recommendation:**

Wendy Chou, EV Charging for All Coalition; See Attachment A for a complete list of signatories and supporting commenters.

The commenter recommends that HCD take into consideration future amendments for the 2025 Intervening Code Adoption Cycle. Specifically, replacing EV Capable with EV Ready in single-family housing and for multifamily dwellings address direct wiring.

**Agency Response:**

HCD appreciates the feedback and recommendations provided by the commenter. Upon review, HCD has decided not to make any additional changes as the commenter's suggestions are beyond the scope of HCD's proposals and did not include discussion with all stakeholders. HCD may engage on this topic in a future code adoption cycle.

**Comment 5  
General.**

**Commenter(s) and Recommendation:**

Kelly Cunningham, Charles Kim, Jeremy Reeve; California Statewide Utility Codes and Standards Team.

The commenters encourage HCD and BSC to work with local governments to collect information on the use of the "infeasibility" exception and recommend revisiting the requirements for EV charger connectors as connector standards advance. Additionally, the commenters suggest limiting the use of receptacles as an option for EV spaces and developing a signage standard for using a J1772-to-J3400 adapter.

**Agency Response:**

HCD appreciates the feedback and recommendations provided by the commenters. Upon review, HCD has decided not to make any additional changes as the commenter's suggestions are beyond the scope of HCD's proposals and did not include discussion with all stakeholders. HCD may engage on this topic in a future code adoption cycle.

**Comment 6**  
**General.**

**Commenter(s) and Recommendation:**

Bryce Nesbitt. Written comment provided, and Public Hearing comment provided on July 2, 2024.

The commenter suggests new one- and two-family dwellings and townhouses with attached private garages should be expanded to detached garages, carports and other dedicated vehicle storage. Additionally, the commenter suggests amending the ALMS provisions within Chapter 4 and recommends amending the 2025 California Electrical Code, Chapter 2, section 210.8.

**Agency Response:**

HCD appreciates the feedback and recommendations provided by the commenter. Upon review, HCD has decided not to make any additional changes as the commenter's suggestions are beyond the scope of HCD's proposals and did not include discussion with all stakeholders. HCD may engage on this topic in a future code adoption cycle.

**Comment 7**  
**General.**

**Commenter(s) and Recommendation:**

Holly Arnold, Gensler – Public Hearing July 2, 2024.

The commenter suggests that HCD consider an exception regarding EV charging requirements for supportive housing where residents may or may not have access to cars.

**Agency Response:**

HCD appreciates the feedback and recommendations provided by the commenter. Upon review, HCD has decided not to make any additional changes as the commenter's suggestions are beyond the scope of HCD's proposals and did not include discussion with all stakeholders. HCD may engage on this topic in a future code adoption cycle.

**Comment 8**  
**General.**

**Commenter(s) and Recommendation:**

Sven Thesen, Electric Vehicle Charging for All Coalition (EVCAC) – Public Hearing July 2, 2024.

The commenter recommends that HCD change the requirements in single-family dwellings from EV Capable to EV Ready.

**Agency Response:**

HCD appreciates the feedback and recommendations provided by the commenter. Upon review, HCD has decided not to make any additional changes as the commenter's

suggestions are beyond the scope of HCD's proposals and did not include discussion with all stakeholders. HCD may engage on this topic in a future code adoption cycle.

**Comment 9  
General.**

**Commenter(s) and Recommendation:**

Jim Frey, 2050 Partners, IOU – Public Hearing July 2, 2024.

The commenter encourages HCD and BSC to work with local governments to collect information on the use of the “infeasibility” exception and recommend revisiting the requirements for EV charger connectors as connector standards advance. Additionally, the commenters suggest limiting the use of receptacles as an option for EV spaces and developing a signage standard for using a J1772-to-J3400 adapter.

**Agency Response:**

HCD appreciates the feedback and recommendations provided by the commenter. Upon review, HCD has decided not to make any additional changes as the commenter's suggestions are beyond the scope of HCD's proposals and did not include discussion with all stakeholders. HCD may engage on this topic in a future code adoption cycle.

**Comment 10  
General.**

**Commenter(s) and Recommendation:**

Maureem Boyer, DignityMoves - Public Hearing July 2, 2024.

The commenter supports the suggestions made by commenter Holly Arnold (Comment 7). Suggests providing only EV Ready to reduce costs.

**Agency Response:**

HCD appreciates the feedback and recommendations provided by the commenter. Upon review, HCD has decided not to make any additional changes as the commenter's suggestions are beyond the scope of HCD's proposals and did not include discussion with all stakeholders. HCD may engage on this topic in a future code adoption cycle.

**Comment 11  
General**

**Commenter(s) and Recommendation:**

Sean Armstrong, Redwood Energy – Public Hearing July 2, 2024.

The commenter recommends wiring directly to tenant apartments and suggests to not provide any exception for multifamily dwellings if there is a permanent parking space for a tenant.

**Agency Response:**

HCD appreciates the feedback and recommendations provided by the commenter. Upon review, HCD has decided not to make any additional changes as the commenter's

suggestions are beyond the scope of HCD's proposals and did not include discussion with all stakeholders. HCD may engage on this topic in a future code adoption cycle.

**Comment 12**  
**General.**

**Commenter(s) and Recommendation:**

Susan Nawbary.

The commenter recommends requests to make bicycle parking mandatory for new housing projects.

**Agency Response:**

HCD appreciates the feedback and recommendations provided by the commenter. Upon review, HCD has decided not to make any additional changes as the commenter's suggestions are beyond the scope of HCD's proposals and did not include discussion with all stakeholders. HCD may engage on this topic in a future code adoption cycle.

**Comment 13**  
**General.**

**Commenter(s) and Recommendation:**

Trish Davy, SMUD.

The commenter recommends that HCD take into consideration future amendments for the 2025 Intervening Code Adoption Cycle. Specifically, revising the exception to focus on the level of charging provided by the EV charging receptacle or charger rather than voltage, as shown in the edited language above. SMUD encourages HCD to revisit the definitions for EV chargers, particularly as it relates to power delivered to the charging EV.

**Agency Response:**

HCD appreciates the feedback and recommendations provided by the commenter. Upon review, HCD has decided not to make any additional changes as the commenter's suggestions are beyond the scope of HCD's proposals and did not include discussion with all stakeholders. HCD may engage on this topic in a future code adoption cycle.

**DETERMINATION OF ALTERNATIVES CONSIDERED AND EFFECT ON PRIVATE PERSONS**

Government Code Section 11346.9(a)(4) requires a determination with supporting information that no alternative considered would be more effective in carrying out the purpose for which the regulation is proposed or would be as effective and less burdensome to affected private persons than the adopted regulation or would be more cost-effective to affected private persons and equally effective in implementing the statutory policy or other provisions of law.

HCD has determined that there are no reasonable alternatives to be considered or have otherwise been identified and brought to the attention of HCD. Health and Safety Code,

Section 17928, mandates HCD to review relevant green building guidelines and to propose green building features that are cost effective and feasible as mandatory building standards. HCD evaluated the available green building guidelines, held multiple focus group meetings, and worked in conjunction with California Air Resources Board, California Building Standards Commission, Division of the State Architect, the building industry, advocates, and other stakeholders to determine the most appropriate building standards.

**REJECTED PROPOSED ALTERNATIVE THAT WOULD LESSEN THE ADVERSE ECONOMIC IMPACT ON SMALL BUSINESSES:**

Government Code Section 11346.9(a)(5) requires an explanation setting forth the reasons for rejecting any proposed alternatives that would lessen the adverse economic impact on small businesses, including the benefits of the proposed regulation per 11346.5(a)(3).

No alternatives were identified to lessen the adverse economic impact on small business.