

293 Pagosa Way
Fremont CA, 94539
July 1, 2024

California Building Standards Commission
Michael Nearman, Deputy Executive Director
2525 Natomas Park Drive, Suite 130
Sacramento, CA 95833

Sent via email cbsc@dgs.ca.gov

To Whom It May Concern:

I appreciate the efforts of the California Building Standards Commission (BSC) and Department of Housing and Community Development (HCD) staff to amend the 2025 California Green Building Standards Code. I recommend you consider the following suggestions.

In regard to BSC 2025 California Green Building Standards Code, Part 11.

Chapter 5, Section 5, Item 2, 5.106.5.3 Electric vehicle charging states in the first sentence, “Construction to provide electric vehicle infrastructure and facilitate electric vehicle charging shall comply with section 5.106.5.3.1 EV capable spaces,” That sentence should clarify what “Construction” means and if it references new construction or includes alterations. If alterations are included, there should be a criterion on the extent of an alteration that requires compliance with Table 5.106.5.3.1.

BSC should seriously consider requiring a level of compliance to Table 5.106.5.3.1 when significant alterations are made to a place of employment. Many employers that have a high level of employees which have adopted EVs today have insufficient number of EV chargers that are significantly over subscribed. Contrary to CARB stating in the ISOR document that most EV users want to charge at home, my observations show that most EV users want to charge at work. Reasons for this are that commercial electric rates are lower than residential electric rates thus leading to lower charging costs and many people still have limitations to charge at home, especially at multi-family residences. Additionally, the greatest reduction in GHG occurs when charging during the morning when there is excess solar power and that occurs when most people are at work. Thus there should be an emphasis on increasing EV charging infrastructure at places of

employment and that requires codes that cover alterations on existing places of employment. The ISOR document states a need to support infrastructure for EV use with goal of supporting 5 million ZEVs by 2030 and 100% EV sales by 2035. The lack of charging infrastructure in both housing stock and places of employment will prevent accomplishing that goal and new construction will not occur at a sufficient level to provide adequate EV charging infrastructure. I suspect that it is easier and lower cost to add EV charging to places of employment than to housing stock for the simple reason that there are fewer locations of employment than housing units. Thus there needs to be a means to accelerate the installation of EV charging at existing places of employment.

Including alterations as a change that will require compliance per 5.106.5.3.1 may result in significant added cost to applicants. However, 5.106.5.3 already includes exception 1c. which states that the local enforcement agency can provide an exception if the compliance to 5.106.5.3 results in a cost that adversely impacts the construction cost. Local compliance agencies should be capable of assessing each alteration project on a case-by-case basis to determine if the extent of work needed to add EV charging is inconsistent with the nature of the alteration. The exemption to 5.106.5.3 should allow local compliance agencies to alter Table 5.106.5.3.1 when implemented during an alteration in a means consistent with anticipated costs. For example, local agency can require to add an lesser amount of EV charging for minor alterations consistent with the electric load allowed by the existing line feed limit from the utility.

Regards,

Steve Skala