



October 29, 2018

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Mia Marvelli
Executive Director, California Building Standards Commission
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Ida Clair
Principal Architect, Division of the State Architect
California Department of General Services
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Subject: Proposed Division of the State Architect CALGreen Electric Vehicle Infrastructure Amendments

Dear Ms. Batjer, Ms. Marvelli, and Ms. Clair,

The coalition of organizations submitting this letter appreciates the opportunity to comment on and supports the proposed 45-Day Expressed Terms for Proposed Building Standards of the Division of the State Architect (DSA) Regarding the Adoption of the 2019 California Building Standards Code (CALGreen). We represent a diverse coalition of organizations – charging station providers, environmental nonprofits, and utilities – that are committed to a future of electrified transportation.

Robust charging infrastructure is needed to unlock the benefits of transportation electrification for California. We are very pleased to see DSA extend EV readiness measures to new construction for California's public schools and community colleges, so that faculty, staff, students, and visitors can access the benefits of EVs. These efforts are consistent with funding by state agencies such as the California Air Resources Board and the California Energy Commission for electric transportation at schools. We also note that DSA's proposed CALGreen provisions will facilitate the future installation of EV charging stations and allow more Californians—who may not have access to charging at home—to drive electric. EV charging at workplaces, multi-unit dwellings, and in public locations has helped give more drivers the confidence to drive electric and schools will also play an important role in encouraging and allowing more Californians to drive an EV.

We also want to highlight the importance of addressing infrastructure in existing buildings as noted in the 2018 ZEV Action Plan.¹ We recommend that DSA update its building code requirements in the future to include renovations such as expansion or renovation of electrical systems serving parking areas, expanding existing parking areas, and repaving projects.

Lastly, we recommend increasing the mandatory minimum ratio of EV ready parking spaces at schools in the near future, as noted in the 2018 ZEV Action Plan, to help support the State's goals for EV infrastructure and EVs. We look forward to working with DSA in future code cycles to strengthen codes to meet the growing EV adoption and infrastructure demand across California.

Thank you for your consideration of these comments and for your leadership, hard work and thoughtfulness in achieving EV readiness at California schools.

cc: Ken Alex
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¹ <http://business.ca.gov/Portals/0/ZEV/2018-ZEV-Action-Plan-Priorities-Update.pdf>

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