



# ECOS

ENVIRONMENTAL  
♦ COUNCIL ♦  
OF SACRAMENTO

Post Office Box 1526 | Sacramento, CA 95812-1526

December 16, 2020

Brandon Estes, Codes and Standards Administrator I  
Department of Housing and Community Development  
Division of Codes and Standards, State Housing Law Program  
9342 Tech Center Drive, Suite 500, Sacramento, CA 95826  
Brandon.Estes@hcd.ca.gov

**SUBJECT: Electric Vehicle Charging Infrastructure  
Proposed changes to Title 24, Part 11 of the 2022 CALGreen Building Code  
for the 2021 Triennial Code Adoption Cycle**

Dear Mr. Estes,

On behalf of the Environmental Council of Sacramento (ECOS), thank you for the opportunity to comment on proposed changes to Title 24, Part 11 of the 2022 CALGreen Building Code for the 2021 Triennial Code Adoption Cycle.

We appreciate the Housing and Community Development's (HCD) efforts to increase electric vehicle (EV) infrastructure in new residential construction in this code cycle, as described in the express terms: <https://hcd.ca.gov/building-standards/building-code/docs/calgreen-fg-express-terms.pdf>

We also appreciate the more aggressive implementation protocol suggested by the California Air Resources Board's (CARB): <https://hcd.ca.gov/building-standards/building-code/docs/calgreen-fg-california-air-resources-board-discussion-items.pdf>

However, at a minimum, we believe the following provision is warranted:

**A working and signed Level 1 outlet (110–120 V) shall be installed at each parking space associated with new residential construction.**

This simple provision would provide low-cost infrastructure that works for any EV. It would ensure that Californians living in any type of new housing – low-income, high-income, mixed-use, multifamily, single-family -- have convenient access to EV battery charging.

Outfitting new residential construction is “low-hanging fruit” i.e. an easy, logical first step to helping California to transition to EVs over the next 15 years (ref. E.O. N-79-20). The retrofit of existing development is more difficult and consequential. Existing development is said to be “75% of the greenhouse gas emissions problem.”

Given this, please seriously consider this provision for the 2022 CALGreen Building Code:

**A working and signed Level 1 outlet (110–120 V) shall be installed at each parking space associated with new construction or the major retrofit of existing construction in any land use type (residential, commercial, industrial, etc.)**

Sincerely,

A handwritten signature in cursive script that reads "Ralph Propper".

Ralph Propper, ECOS President

cc: [Emily.Withers@hcd.ca.gov](mailto:Emily.Withers@hcd.ca.gov), [Kyle.Krause@hcd.ca.gov](mailto:Kyle.Krause@hcd.ca.gov), [Hannah.Goldsmith@gobiz.ca.gov](mailto:Hannah.Goldsmith@gobiz.ca.gov), [Enrique.Rodriguez@dgs.ca.gov](mailto:Enrique.Rodriguez@dgs.ca.gov), [Michael.Nearman@dgs.ca.gov](mailto:Michael.Nearman@dgs.ca.gov), [Kathy.Jaw@arb.ca.gov](mailto:Kathy.Jaw@arb.ca.gov), [Sam.Lerman@arb.ca.gov](mailto:Sam.Lerman@arb.ca.gov)