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Ben Metcalf, Director
California Department of Housing and Community Development
2020 West El Camino Avenue
Sacramento, CA 95833

Submitted via email to: Richard.Weinert@hcd.ca.gov, Deputy Director, Codes & Standards

Subject: CALGreen 2019 Rulemaking Cycle Electric Vehicle (EV) Readiness Measures

Dear Director Metcalf:

On behalf of the more than 350 members of the Silicon Valley Leadership Group, I write in support of strengthening EV-ready parking requirements for new residential and commercial developments in the California Building Standards Commission's 2018 triennial code adoption cycle. This recommendation is aligned with the Leadership Group's goals of financing and deploying zero-emissions vehicles (ZEVs) and EV infrastructure, and meeting SB 32's greenhouse gas emissions reductions targets of 40 percent below 1990 levels by 2030.

In order to meet California's transportation electrification and 2030 climate goals, new buildings must include more EV charging infrastructure. In fact, the California Air Resources Board (CARB) recommends increasing EV-ready parking requirements for new residential developments from the existing three percent requirement to help curb the 39 percent in carbon emissions generated by California transportation sector -- the leading contributor to greenhouse gas emissions. According to CARB's latest cost analysis, pre-wiring parking spaces for EV charging infrastructure could result in \$264 to \$374 million in avoided retrofit costs between 2020-2025.

To support the transition to ZEVs, Governor Brown has provided a multi-year funding plan to invest \$900 million in the installation of 250,000 EV chargers, including 10,000 DC fast chargers, by 2025, and a \$35 million annual increase in Cap and Trade auction proceeds of the California Clean Vehicle Rebate Project to bolster new ZEV purchases. With the help of these important incentives, California leads the nation in ZEV purchases, and sets the standard for forward-thinking energy and environmental policies. The Leadership Group encourages you to strengthen EV readiness for new developments to support the accelerated deployment of ZEVs and installation of EV infrastructure.

The Leadership Group, founded in 1978 by David Packard of Hewlett-Packard, represents more than 350 of Silicon Valley's most respected employers on issues that affect the economic health and quality of life in Silicon Valley, including housing, energy, environment, transportation, education, health care, tax policies, and economic vitality. If you have any questions, please do not hesitate to contact Heidi Sickler, Energy and Environment Senior Associate, at hsickler@svlg.org or (408) 501-7883.

Sincerely,

Tim McRae
Vice President, Energy