



Date: June 25, 2014

To: Secretary Marybel Batjer, Chair  
Members, Building Standards Commission  
Jim McGowan, CBSC Executive Director

From: California Building Industry Association	California Manufacturers & Technology Association
California Business Properties Association	NAIOP of California, the Commercial Real Estate Assn
California Apartment Association	International Council of Shopping Centers
California Chamber of Commerce	American Institute of Architects, California Council
Building Owners & Managers Assn. of CA	California Retailers Association

**RE: SUPPORT for BSC and HCD Updates to the California Green Building Standards {California Code of Regulations, Title 24, Part 11}**

The above listed organizations are pleased to inform you that we strongly support adoption of the proposed updates to the California Green Building Standards as proposed by the Building Standards Commission (for commercial construction) and the Department of Housing & Community Development (for residential construction). This support relates to the initial changes contained in the 45-Day Language issued in April of 2014 and the subsequent amendments contained in the 15-Day Language issued in June.

The most notable changes in this update of CALGreen is the inclusion of mandatory “EV-Ready” building standards for the parking lots of new commercial buildings and apartment complexes and for all garages in new homes starting July 1, 2015. In general, these buildings standards will require slightly larger electrical panels and the installation of conduit to protect the wiring that will connect the panel to the EV charging equipment that may be installed at a later date. For commercial building and apartment parking lots, a small percentage of the parking spaces will be “EV-Ready”. For new home construction, all garages will have to meet HCD’s EV-Ready requirement.

While industry would have preferred these new regulations take effect as part of the next Triennial Code Adoption Cycle (effective 1/1/17), we understand how important this issue is to the Governor and his Administration. Making these changes at the time of construction can greatly reduce the cost of EV Charging equipment retrofit down the road. As such, we are supporting this major change as part of the Intervening Code Adoption Cycle which will take effect on July 1, 2015.

Both HCD and BSC staffs should be commended for all the work that has gone into the fast-track development of these regulations. Recognizing that there is the potential for unforeseen impacts, both sets of regulations have included modest exemptions should local issues result in construction-cost increases not anticipated by either of these two proposing state agencies. Industry is grateful for this consideration and we strongly support the adoption of both of these regulatory packages.