

Communication from Public

Name: Yasmine Agelidis
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Council File No: 17-0309
Comments for Public Posting: Re: Item No. 17-0309 - Electric Vehicle Charging Building Code Requirements



December 10, 2019

Chair Harris-Dawson and Members of the Committee
Planning and Land Use Management Committee
200 North Spring Street
Los Angeles, CA 90012

Re: Item No. 17-0309 – Electric Vehicle Charging Building Code Requirements

Dear Chair Harris-Dawson and Members of the Committee:

On behalf of Earthjustice, Communities for a Better Environment, Sierra Club, and International Brotherhood of Electrical Workers, we submit comments on the new electric vehicle (EV) building code requirements. Our organizations really appreciate the City of Los Angeles addressing this critical topic. But, we fear the proposed standards are not sufficient to address the current air quality and climate crisis we are facing. While we encourage the committee to adopt these standards as soon as possible because they are better than the current standards, we suggest direction from the committee to pursue standards that are more reflective of the needs to support EVs out into the future. Indeed, installing electrical charging infrastructure before a building is built is much more efficient than trying to retrofit after the fact. While we must encourage people out of their cars and onto public transit as much as possible, it is equally important in the battle against air pollution and climate change that the number of charging spaces for EVs match the growing number of EVs on the road.

That is why our organizations support further changes to the building code to do the following. First, the building code should distinguish amongst different types of buildings. An apartment is different than a pharmacy, which is different than a shopping mall. Second, we suggest the following standards apply to new buildings.

- Multifamily Buildings – a minimum of 10% of spaces with Level 2 chargers installed and a minimum of 30% of parking spaces EV-ready.
- Commercial – a minimum of 10% of spaces with Level 2 chargers installed and a minimum of 20% EV-ready. In this instance, the developer should have the ability to substitute DC fast chargers (DCFC) for Level 2 chargers (e.g., 1 50 kW DCFC for every 5 Level 2 chargers).

Tackling climate change and air pollution means we must shift to zero-emission vehicles wherever possible. This will require dramatic increases in the number of EVs, and will similarly require dramatic increases in the demand for charging infrastructure. To support this growth, our new buildings must have much more charging infrastructure than is currently required under this plan. By adopting these standards and directing staff to propose how to further strengthen them, the committee can assure sustained progress while meeting our significant environmental challenges.

We appreciate your consideration of these comments.

Sincerely,

A handwritten signature in black ink that reads "Adriano L. Martinez". The signature is written in a cursive style with a long, sweeping underline.

Adriano L. Martinez
Yasmine Agelidis
Earthjustice

Bahram Fazeli
Communities for a Better Environment

Jennifer Kropke
International Brotherhood of Electrical Workers

Carlo De La Cruz
Sierra Club