

STATE OF CALIFORNIA  
DEPT. OF GENERAL SERVICES - GOVERNMENT OPERATIONS AGENCY  
CALIFORNIA BUILDING STANDARDS COMMISSION  
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Office Use Item No. \_\_\_\_\_

**PARTICIPATION COMMENTS FOR THE NOTICE DATED OCTOBER 8, 2015**  
Written comments are to be sent to the above address.

**WRITTEN COMMENT DEADLINE: NOVEMBER 23, 2015 at 5:00pm**

Date: October 13, 2015

From: Mehdi Shadyab, P.E., CASp (mshadyab@sandiego.gov)

\_\_\_\_\_  
Name (Print or type) (Signature)  
On behalf of The City of San Diego, Development Services Department, Structural Plan Review Section

\_\_\_\_\_  
Agency, jurisdiction, chapter, company, association, individual, etc.  
1222 First Avenue, M.S. 401, San Diego, California, 92101-4154

\_\_\_\_\_  
Street City State Zip

I/We (do)(do not) agree with:

[  ] The Agency proposed modifications As Submitted on Section No. \_\_\_\_\_

and request that this section or reference provision be recommended:

[  ] Approved [  ] Disapproved [  ] Held for Further Study [  ] Approved as Amended

**Suggested Revisions to the Text of the Regulations:**

Please see our comments and recommended revisions to the proposed text of DIVISION 8, Section 11B-812 Electric vehicle charging stations, as highlighted below:

**11B-812 Electric vehicle charging stations**

**11B-812.1 General.** *The purpose of the Electric Vehicle Charging Stations (EVCS) is to provide a service for charging electric vehicles. Accessible parking spaces which serve the buildings or facilities shall be provided per Section 11B-208. ~~Electric vehicle charging stations (EVCS)~~ EVCS shall comply with Section 11B-812 as required by Section ~~11B-228.3~~ 11B-208.2. Where vehicle spaces and access aisles are marked with lines, measurements shall be made from the centerline of the markings.*

**Exception:** *Where vehicle spaces or access aisles are not adjacent to another vehicle space, access aisle, or parking space, measurements shall be permitted to include the full width of the line defining the vehicle space or access aisle.*

**REASON:** A great majority of the plans we receive and review for installations of the EVCS are in existing facilities (parking lots and parking structures). In those great majority of plans, EVCS are placed in the existing accessible parking spaces. The intent of the EVCS should be clearly spelled out that is a service, and the purpose

of accessible parking spaces are to provide access to the buildings and facilities they serve. Stated Exception is redundant and will only add confusion. Therefore, recommended to omit. "Approve As Amend".

**11B-812.4 Vertical clearance.** Vehicle spaces, access aisles serving them, and vehicular routes serving them shall provide a vertical clearance of 98 inches (2489 mm) minimum. ~~Where provided, overhead cable management systems shall not obstruct required vertical clearance.~~ The vertical clearance shall be measured from top of the ground surface of the vehicle space and access aisle to bottom of any structure or element, including cable management system where provided.

**REASON:** The vertical clearance requirement is for any projection and not just for cable management system. Provision should be revised to state clearly how the vertical clearance is measured. "Approve As Amend".

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**11B-812.5 Accessible routes**

**Exception:** EVCS complying with Section 11B-812 shall be permitted to be located in different EV charging facilities if substantially equivalent or greater accessibility is provided in terms of distance from an accessible entrance or entrances, charging fee, and user convenience.

**REASON:** This Exception seems redundant, as to what would be considered "different EV charging facilities". Would use of a accessible EV charging facility located across the street from a building under consideration, on another owner's property, be considered "equivalent"? This Exception would greatly burden the Building Official to consider and evaluate many such proposals under the term of being 'equivalent'. Therefore, recommended to omit. "Approve As Amend".

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**11B-812.5.2 Accessible route to EV charger.** An accessible route complying with Section 11B-402 shall be provided between the vehicle space and the EV charger ~~which serves it.~~ serving the space.

**REASON:** Revised to better clarify. "Approve As Amend".

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**11B-812.5.4 Arrangement.** Vehicle spaces and access aisles shall be designed so that persons using them are not required to travel behind vehicle spaces or parking spaces other than the vehicle space in which their vehicle has been left to charge.

**Exceptions:**

1. Ambulatory EVCS shall not be required to comply with Section 11B-812.5.4.
2. Vehicle spaces installed in existing facilities shall comply with Section 11B-812.5.4 to the maximum extent feasible.

**REASON:** The term "Ambulatory EVCS" is not defined. Please add the definition of Ambulatory EVCS to Chapter 2, Section 202-Definitions. "Approve As Amend".

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**11B-812.5.5 Obstructions.** EVCS shall be designed so accessible routes are not obstructed by EV charger unit, cables or other elements.

**REASON:** Added language for better clarification. "Approve As Amend".

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**11B-812.7.1 Location.** Access aisles at vehicle spaces shall not overlap the vehicular way and may be placed on either side of the vehicle space they serve. ~~except for van.~~ Van accessible spaces ~~which~~ shall have access aisles located on the passenger side of the vehicle spaces.

**REASON:** The one sentence is too long and compounding. Please revise to two separate, distinct and clear sentences. "Approve As Amend".

**11B-812.7.2 Marking.** Access aisles at vehicle spaces shall be marked with a painted borderline around their perimeter. The area within the borderlines shall be marked with hatched lines a minimum of 36 inches (914 mm) on center. The color of the borderlines, hatched lines, and letters shall contrast with that of the surface of the access aisle. The blue color required for identification of access aisles for accessible parking **spaces serving the buildings and facilities** shall not be used. Access aisle markings may extend beyond the minimum required length.

**REASON:** Added language for better clarification. "Approve As Amend".

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**11B-812.9 Surface marking.** EVCS vehicle spaces shall provide surface marking stating "EV CHARGING ONLY" in letters 12 inches (305 mm) high minimum. The centerline of the text shall be a maximum of 6 inches (152 mm) from the centerline of the vehicle space and its lower corner at, or lower side aligned with, the end of the parking space length. **EV chargers placed in accessible parking spaces serving the buildings or facilities shall not be marked per this section.**

**REASON:** Added language for better clarification. "Approve As Amend".

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**FIGURE 11B-812.9  
SURFACE MARKING**

**Omit location of the clear floor space as shown on the Figure behind the EV charger. Relocate the location of the clear floor space in front of the EV charger.**

**REASON:** The figure shows the clear floor space behind the EV charger. In the great majority of the plans received and reviewed by this Department, the EV charger plug are located in the front of the charge. The figure as depicted requires the disabled person to locate him or herself behind the charger and to reach around to grab and pull-out the plug. Recommend to show the clear floor space in front of the EV charger, at the same elevation as the parking space and access aisle. The plug and the point-of-sale shall meet the reach range of Section 11B-308.3.1, Exception 2 and 11B-309. "Approve As Amend".

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**11B-812.10.4 Location.** EV chargers shall be adjacent to, and within the projected width of the vehicle space being served.

**Exceptions:**

1. EV chargers serving more than one EVCS shall be adjacent to, and within the combined projected width of the vehicle spaces being served.
2. **For alterations at existing facilities** where an accessible route or general circulation path is not provided adjacent to the head end of the vehicle space or access aisle, the EV charger may be located **a maximum of 36 inches from the head of the access aisle** within the projected width of the access aisle. ~~36 inches (914 mm) maximum from the head end of the space.~~

**REASON:** Added language for better clarification. "Approve As Amend".

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**/// END OF COMMENTS**

**Reason:** [The reason should be concise if the request is for "Disapproval," "Further Study," or "Approve As Amend" and identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]

## HEALTH & SAFETY CODE SECTION 18930

### SECTION 18930. APPROVAL OR ADOPTION OF BUILDING STANDARDS; ANALYSIS AND CRITERIA; REVIEW CONSIDERATIONS; FACTUAL DETERMINATIONS

- (a) Any building standard adopted or proposed by state agencies shall be submitted to, and approved or adopted by, the California Building Standards Commission prior to codification. Prior to submission to the commission, building standards shall be adopted in compliance with the procedures specified in Article 5 (commencing with Section 11346) of Chapter 3.5 of Part 1 of Division 3 of Title 2 of the Government Code. Building standards adopted by state agencies and submitted to the commission for approval shall be accompanied by an analysis written by the adopting agency or state agency that proposes the building standards which shall, to the satisfaction of the commission, justify the approval thereof in terms of the following criteria:
- (1) The proposed building standards do not conflict with, overlap, or duplicate other building standards.
  - (2) The proposed building standard is within the parameters established by enabling legislation and is not expressly within the exclusive jurisdiction of another agency.
  - (3) The public interest requires the adoption of the building standards.
  - (4) The proposed building standard is not unreasonable, arbitrary, unfair, or capricious, in whole or in part.
  - (5) The cost to the public is reasonable, based on the overall benefit to be derived from the building standards.
  - (6) The proposed building standard is not unnecessarily ambiguous or vague, in whole or in part.
  - (7) The applicable national specifications, published standards, and model codes have been incorporated therein as provided in this part, where appropriate.
    - (A) If a national specification, published standard, or model code does not adequately address the goals of the state agency, a statement defining the inadequacy shall accompany the proposed building standard when submitted to the commission.
    - (B) If there is no national specification, published standard, or model code that is relevant to the proposed building standard, the state agency shall prepare a statement informing the commission and submit that statement with the proposed building standard.
  - (8) The format of the proposed building standards is consistent with that adopted by the commission.
  - (9) The proposed building standard, if it promotes fire and panic safety as determined by the State Fire Marshal, has the written approval of the State Fire Marshal.