



*Always There for You!*

September 28, 2015

*Via email*

Jim McGowan, Executive Director  
California Building Standards Commission  
2525 Natomas Park Drive, Suite 130  
Sacramento, CA 95833

Michael Nearman, Deputy Executive Director  
California Building Standards Commission  
2525 Natomas Park Drive, Suite 130  
Sacramento, CA 95833

**SUBJECT:      Comments on the DSA-AC Proposed Title 24, Part 2 and Part 10 EVCS  
                  Accessibility Regulations**

Dear Mr. McGowan and Mr. Nearman:

On behalf of Burbank Water and Power (BWP), I appreciate the opportunity to comment on the proposed Title 24, Part 2 and Part 10 regulations relating to accessibility of Electric Vehicle Charging Stations (EVCS) by persons with disabilities, drafted by the Division of the State Architect-Access Compliance (DSA-AC).

BWP is a publicly owned utility serving the residents and businesses of Burbank with electricity and water. We have a relatively large number of electric vehicle (EV)-charging-infrastructure units throughout the community. BWP is committed to transportation electrification and doing our part by supplying the fuel, which is imperative for California to meet its environmental and energy goals.

The Governor's Executive Order B-16-2012 set goals for California to achieve a zero-emission vehicle infrastructure able to support 1 million vehicles by 2020, 1.5 million zero-emission vehicles on California roads by 2025, and easy access for Californians to zero-emission vehicle infrastructure. California also has stringent greenhouse gas emission reduction and air quality mandates. We appreciate the efforts of DSA-AC to balance California's EV infrastructure and accessibility objectives through these regulations.

As a member of CalFETC, we respectfully and fully join in support of CalFETC's comments detailed in their comment letter dated September 25, 2015. BWP's main concern with the regulations, as currently drafted, is that cost considerations were not taken into consideration when DSA-AC proposed the regulations. I encourage DSA-AC and the BSC to exempt retrofit projects from these proposed regulations as was done by the California Air Resources Board (CARB). CARB exempted retrofit projects from its proposed amendments to the nonresidential EV charging standards in the Green Building Standards Code. CARB's proposed amendments, which were approved by the BSC's Green Building Code Advisory Committee, expressly applied solely to new construction. Requiring retrofit projects to comply with these accessibility provisions would be inconsistent with CARB's related EVCS modifications.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ron Davis", written in a cursive style.

Ron Davis  
General Manager, BWP