

**RICHARD F. TEEBAY**

September 28, 2015

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

Subject: Comments on proposed changes to 2016 California Building Code, Title 24, Part 2

Dear Mr. McGowan:

My name is Richard Teebay. I am employed by the County of Los Angeles' Office of Sustainability and, with Patricia Kwon of the South Coast Air Quality Management District, I served as Co-Chair of the Southern California Association of Governments' (SCAGs) Plug-In Electric Vehicle (PEV) Coordinating Council. I am also a Co-Chair of the Los Angeles Economic Development Corporation's e-4 Mobility Alliance (formerly the e-Mobility Task Force). I am writing you today as a private citizen and not as a representative of my employer, the SCAG PEV Coordinating Council, or the LAEDC's e-4 Mobility Alliance. Thank you for allow me to submit my comments.

I have been actively engaged in creating and recreating the EV infrastructure within the Los Angeles region for more than five years. I have applied for, and the County has received, four grants to install EVSE, primarily at County worksites.

I purchased a Nissan LEAF about four years ago, and have driven it more than 52,000 miles (1,000~1,200 miles per month). As a battery electric vehicle (BEV) driver, I know that range and public charging REALLY matter.

Currently, there are more than 150,000 Plug-in Electric Vehicles (PEVs) in California, more than 30,000 in Los Angeles County alone. Several years ago, I spoke with Richard Lowenthal of ChargePoint. Richard said that the Bay Area and Los Angeles each had about 20,000 PEVs. He said that in the San Francisco Bay Area, the Nissan LEAF out sold the Chevrolet Volt. But in the Los Angeles, the Volt out sold the LEAF. He attributed the differences to two factors. The longer commutes in the L. A. region and the lack of public EVSE in L.A. vs. the Bay Area. Richard said that the Bay Area had about twice as many public Level 2 EVSE as the Los Angeles region has – even though this region has almost twice the population. (Businesses in the Tech sector have lead the way installing infrastructure in the Bay Area.) The take away is that the

lack of EVSE infrastructure appears to be a significant barrier in Los Angeles, especially in Disadvantaged Communities.

The County of Los Angeles has installed more than 125 Level 2 EVSE at more than 30 locations. A few are Fleet Only. Most are accessible to employees and/or the public on a first come, first serve basis. From the beginning, in the late 1990s, most County sites were ADA ready but not posted as ADA only.

I would like to offer the following comments:

## ***Division 2 – Scoping***

### **11B-202 Existing buildings and facilities**

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#### **11B-202.4 Path of travel requirements in alterations, additions and structural repairs.**

*When alterations or additions are made to existing buildings or facilities, an accessible path of travel to the specific area of alteration or addition shall be provided. The primary accessible path of travel shall include:*

1. *A primary entrance to the building or facility,*
2. *Toilet and bathing facilities serving the area,*
3. *Drinking fountains serving the area,*
4. *Public telephones serving the area, and*
5. *Signs.*

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#### **Exceptions:**

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10. *Alterations solely for the purpose of installing electric vehicle chargers and vehicle spaces at sites where vehicle fueling, recharging, parking or storage is a primary function shall comply with Section 11B-202.4 to the maximum extent feasible without exceeding 20 percent of the cost of the work directly associated with the installation of electric vehicle chargers and vehicle spaces. **AGREE***

*Alterations solely for the purpose of installing electric vehicle chargers and vehicle spaces at sites where vehicle fueling, recharging, parking or storage is not a primary function shall not be required to comply with Section 11B-202.4. **AGREE***

*Because there are currently only 7,300 Level 2 EVSE Statewide for 150,000+ PEVs, I would propose that there be a threshold that triggers ADA Requirements at a given site. For example, if one is installing one to four (1-4) or one to six (1-6) EVSE at a given site, the site should, to the maximum extent possible, conform to ADA requirements – slope, path of travel, a van accessible space, and a full size space. But these spaces would not have to be posted as ADA only. At some County sites, some EVSE have been posted for ADA and/or ADA-EVSE ONLY. The EVSE in these ADA spaces are seldom, if ever, used. I am the only one who has periodically used the ADA EVSE in front of my work site (just to make sure that it was working and would be available if needed).*

**11B-228.3.2 Minimum number.** *EV chargers and vehicle spaces complying with Section 11B-812 shall be provided in accordance with Section 11B-228.3.2. Where EV chargers are provided in more than one parking facility on a site, the number of EV chargers and vehicle spaces complying with Section 11B-228.3.2 provided on the site shall be calculated according to the number required for each parking facility. When an EV charging unit can simultaneously charge more than one vehicle, the number of EV chargers provided shall be considered equivalent to the number of electric vehicles that can be simultaneously charged.*

**Exceptions:**

- 1. EV chargers and vehicle spaces not available to the general public and intended for use by a designated vehicle or driver shall not be required to comply with Section 11B-228.3.2. Examples include, but are not limited to, EV chargers and vehicle spaces serving public or private fleet vehicles and EV chargers and vehicle spaces assigned to an employee. **AGREE***
- 2. In public housing facilities, EV chargers and vehicle spaces intended for use by an EV owner or operator at their residence shall not be required to comply with Section 11B-228.3.2. **AGREE***

**Division 3 – Building Blocks**

**11B-309 Operable parts**

**11B-309.1 General.** Operable parts shall comply with Section 11B-309.

**11B-309.2 Clear floor space.** A clear floor or ground space complying with Section 11B-305 shall be provided.

**11B-309.3 Height.** Operable parts shall be placed within one or more of the reach ranges specified in Section 11B-308.

**11B-309.4 Operation.** Operable parts shall be operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist. The force required to activate operable parts shall be 5 pounds (22.2 N) maximum.

**Exception:** Gas pump nozzles and electric vehicle connectors shall not be required to provide operable parts that have an activating force of 5 pounds (22.2 N) maximum. **AGREE**

**Exception:** Permit individual sites the flexibility of valet parking and/or mobile charging (i.e. Mobi Charger FreeWire) in lieu of the operable parts requirements and other issues.

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**11B-812.5 Accessible routes**

**11B-812.5.1 Accessible route to building or facility.** *EV chargers and vehicle spaces complying with Section 11B-812 that serve a particular building or facility shall be located on an accessible route to an entrance complying with 11B-206.4. Where EV chargers and vehicle spaces serve more than one accessible entrance, EV chargers and vehicle spaces complying with Section 11B-812 shall be dispersed and located on an accessible route to the accessible entrances. Where EV chargers and vehicle spaces do not serve a particular building or facility, EV chargers and vehicle spaces complying with Section 11B-812 shall be located on an accessible route to an accessible pedestrian entrance of the EV charging facility.*

**Exception:** *EV chargers and vehicle spaces 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. **AGREE***

**This is especially important to larger venues, such as Dodger Stadium, Staples Center, Levi's Stadium, etc., where the ADA spaces are adjacent to the entrance of these facilities and with an appropriate path of travel. This also impacts facilities where ADA spaces are adjacent to a building while general parking is across a street or alley in a parking lot or structure.**

Thank you for allowing me to provide my comments.

Respectfully,

Richard F Teebay