

Nearman, Michael@DGS

From: John Paul Scott <jpscott1920@gmail.com>
Sent: Wednesday, October 21, 2015 5:49 PM
To: CBSC@DGS
Subject: Proposed changes to the CBC Title 24 Part 2

Dear Division of the State Architect.

Thank you for the hard and diligent work you and the staff have put into the Triennial Cycle for the changes for the 20105 CBC. I agree with the majority of the items proposed. I have provided recommendations on several, in which I how are more editorial in nature that substantive.

I professionally and personally appreciate Dennis Corelis and Derik Shaw and the staff's work in providing sunshine to the public outreach and process of engagement for community members, and balancing pubic comment from a variety of stakeholder, and not just a few loud ones.

--

John Paul Scott, AIA CASp

CREATE Access, Architects / Consultants

73 Sumner Street, Loft 105

San Francisco, CA 94103

www.CREATEAccessADA.com

jpscott1920@gmail.com

cel 818-307-2244

tel 415-255-0573

Nearman, Michael@DGS

From: John Paul Scott <jpscott1920@gmail.com>
Sent: Wednesday, October 21, 2015 5:40 PM
To: CBSC@DGS
Subject: Proposed Building Standards, Public Comment ?Sections 11B-228.3, 11B-220.2 and 11B-812

To the Division of the State Architect.

In Sections 11B-228.3, 11B-220.2 and 11B-812, there are many circular and looping references which are misplaced. Instances where a Chapter 3 building block is scoped under a Chapter 2 scoping section and circular references bounce between Sections 11B-220.2, 11B-707, 11B-228.3 and 11B-812.10. As one of the architects who helped create this system, I proposed the following revision for your consideration. There are only two potential scoping or technical references that may be new but, DSA would have to closely look at the before, and after language to see if they are truly editorial.

- 1) Splitting Point of Sales standalone machines form point of sales components integrated into a EV charging station pedestal or wall unit; and
- 2) 11B-228.3.1.2's specific reference to 11B-309.4 would have specifically not required a clear floor area at EV charger operable parts by exclusion.

My recommendation is to:

CONSOLIDATE ELECTRICAL VEHICLE CHARGERS AND RELATED EV POINT-OF-SALES TO THE 11B-228.3 SCOPING SECTION WHERE THEY SHOULD BE AFFIRMATIVELY SCOPED

11B-228.3 Electric vehicle charging stations.

11B-228.3.1.1 General ...

~~11B-228.3.1.2 Operable Parts, Where EV chargers are provided, operable parts on all EV chargers shall comply with Section 309.4~~

[EV chargers and their operable are proposed to be addresses in 11B-228.3.3 and 11B-812.20.3]

11B-228.3.1 Minimum Number...

11B-228.3.3 Electrical Vehicle (EV) Chargers and Point of Sales Devices.

11B-228.3.3.1 All EV chargers shall comply with 11B-812.10

11B-228.3.3.1 Point-of-Sales Devices at EV Charging Stations shall comply with shall comply with 11B-220.2.

[I am assuming here that DSA intended this to read as stand-alone pay points as well as pay points on the charger pole itself. I have broken these into two parts. 1) The stand-alone pay point is simply as DSA has intended it added it into 11B-220.2 2) and that play-point can be integrated into the charger's equipment and its technical scoping should be separately addressed as it did in the prevision draft in Section 11B-812.10.3 – which scopes specific paragraphs of 11B-707]

REVISE 11B-812.10 ELECTRICAL VEHICLE CHARGERS AS FOLLOWS.

11B-812.10 Electric Vehicle Chargers.

11B-812.10.1 General. EV chargers shall comply with Section 11B-812.10.

11B-812.10.2 Clear Floor or Ground Space. A clear floor or ground space complying with Section 11B-305 shall be provided and it shall be on an accessible route complying with 11B-402.

11B-812.10.3 Operable Parts. Operable parts and charging cord storage shall comply with 11B-309.

(Note that there is an exception proposed by DSA for the 5 pound force on the connector in 11B-309.4)

11B-812.10.4 Point-of-Sales devices integrated with Electrical Vehicle Chargers. ~~Where provided, point-of-sales devices integrated within electric vehicle chargers shall comply with 11B-707.2~~ *[don't need 11B-707.2 because it is in 11B-812.10.]* 11B-707.3, 11B-707.7.2 and 11B-707.9.

DELETE AND RENAME / RELOCATE TECHNICAL CRITERIA BUILDING BLOCK TO 11B-11B-812.20.3.

~~11B-228.3.1.2 Operable Parts. Where EV chargers are provided, operable parts on all EV chargers shall comply with Section 11B-309.4.~~

~~11B-812.2 Operable parts. Operable Parts shall comply with section 11B-309~~

DELETE BECAUSE IT IS CIRCULAR SCOPING THROUGH AN EXCEPTION, AND WHOSE SCOPING SHOULD BE COVERED IN SECTION 11B- 228.

11B-220.2 Point of Sales

~~Exception 2 Point of Sales at electric vehicle charging stations required to comply with 11B-812 shall comply with Section 11B-812.10.3.~~

[This references 11B-812.10.3 is for references to a specific list of paragraphs in 11B-707 Point of Sales under EV Chargers and it is not clear if this is reference standalone point of sale or point of sales integrated into the EV charger column or pedestal. My proposal breaks the two clearly apart. And relocates both into Scoping 11B-228.3.3.]

11B-812.5.2 Accessible Route to EV Charger [from vehicle space which it serves] is not necessarily redundant to 11B-812.10.1 proposed above

Best,

--

John Paul Scott, AIA CASp
CREATE Access, Architects / Consultants
73 Sumner Street, Loft 105
San Francisco, CA 94103
www.CREATEAccessADA.com
jpscott1920@gmail.com
cel 818-307-2244
tel 415-255-0573

