

# Eugen Dunlap

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27 September 2015

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

Re: My concerns with the current ADA proposal for ev charging spaces

Dear Mr. McGowan,

There are a couple of unclear situations:

- See Cosumnes River College parking garage in South Sacramento – they have separate ev chargers within the ‘Handicapped spaces’ – is this scenario even legal under the new proposed regulation.
- I understand that this does not apply for schools: Woodland School district put their new chargers right next to handicapped spaces and the cords are long enough. Does this work in general?
- A shopping center has several different locations for ev charging (one on the West side and one on the East side of a giant parking lot) – is this considered one facility?
- We are always advocating putting ev charging spaces far away in less attractive space to avoid blocking through regular cars – ‘Handicapped Spaces’ are always closer to facilities in prime space. A potential conflict.
- What constitutes an upgrade to an older location and triggers the new code: does a new asphalt seal, repainting worn stripping or replacing a defect charger with the same unit do this?

Then there are real problems with the proposal:

- One charging space at one location is now dead; otherwise it would have to be a ‘Van Accessible’ space which would be never ever used in the next couple of years.
- The current proposal of one ‘Van Accessible’ and one ‘Standard Accessible’ would basically take 2 out of the 5 spaces (in a 5 space scenario) out of business. Nobody would dare to park there even if there was an understanding that one of them could be used by a ‘normal’ driver’. Just too complicated and too much ambiguity.
- Current proposal will make it even harder to find private site owners willing to put in the necessary infrastructure to achieve the governor’s goal of over a million evs on the road.

My recommendation is to change the ‘Total Number of EVCS at a Facility’ from ‘1 to 4’ to **‘2 to 10’**.

Greetings

eugen dunlap