

Pls. comment to DSAAC 09/15
Pt-2, CB.



September 28, 2015

California Building Standards Commission
2525 Natomas Park Drive, Suite 130
Sacramento, CA 95833

ATTN: Jim McGowan, Executive Director

Re: Comments on Proposed Changes to the California Building Code, California Code of Regulations, Title 24, Part 2 Related to the Accessibility Provisions of the 2016 California Building Code

Dear Mr. McGowan:

The Electric Auto Association (EAA) was formed in 1967, California. It is EAA is a non-profit educational organization that promotes the advancement and widespread adoption of Electric Vehicles. The Sacramento chapter alone has over 500 members and growing.

As you are most likely aware, the California State government has adopted aggressive plans to fight climate change and dangerous air quality levels, and provide energy security and local jobs. Broad adoption of 1.5 million EVs within 10 years is a major component necessary to meet these goals.

That broad deployment must include support for the disabled. The executive board of the Sacramento EAA chapter has a member with mobility impairments.

Broad deployment of a charging infrastructure is vital to the success of EV adoption and is a major challenge in front of us. The benefits, while absolutely clear for the state with clean air, lowered climate change risk, economic security and local jobs, are negligible when boiled down to an owner of a new or upgraded site. Land owners and business owners generally do not share in the benefits of adding EVCS's on their property and it can be nearly impossible to make a solid business case for them to do so. Even with full external coverage for installation costs, our experience is that a substantial majority of valuable sites are lost due to this. Even though we make it "Free" to the business and property owner, we fail to secure most sites. Those that do provide sites, often do so recognizing and support the general public interest.

We support the general spacing and signage requirements to ensure access to charging.

However, the proposed changes that require Path of Travel upgrades, even if capped at 20% of construction cost could place this burden solely on the property owner. It is not clear that state grants would include these costs. We ask that this be clarified and resolved such that the public benefit gained through using state grants and financing include these costs.

For these same reasons, we also support the changes proposed by the Plug In American organization as insightful, well thought out and a practical balance between achieving a state interest and meeting the needs of the disabled. Specifically:

Retrofits -- As written, the current regulations apply to both new EVCS construction and retrofit operations to install EVCS in existing facilities. We urge BSC to consider exempting retrofit projects from these new regulations or exempting retrofit projects for small parking lots (such as parking lots with 10 or fewer parking spaces). Small parking lots present great challenges if EVCS-enabled parking spots require a second van-accessible ADA. A ten parking space parking lot (at a state park or small local historical destination, for example,) can become a 3 to 5 space parking lot. These regulations will decrease the amount of EVCS retrofit projects due to the valid concern that property owners have about losing parking spots in order to meet the accessible EVCS requirements. If retrofit operations cannot be exempted from the regulations, then we urge BSC to consider the sharing concept.

"Sharing Concept" -- Sharing is when an existing handicapped-only van-accessible parking space is used both as a van-accessible EVCS and as a traditional handicapped-only van-accessible parking space.

Currently, the DSA's proposed regulations neither explicitly allow nor prohibit "sharing." However, the regulations are worded such that it would be basically impossible to "share" an accessible spot. In order to ensure that retrofit projects remain feasible, we request for sharing to be explicitly allowed. Specifically, we request that in retrofit situations, an exemption for shared spots from the "EV CHARGING ONLY" surface marking requirement in 11B-812.9.

Sharing seeks to solve the space problem associated with retrofit projects because the accessible and non-accessible parking spots that would be retrofitted into EVCS already exist in the parking lot. Please see PIA's charging station guidelines diagrams in the attached appendix which show how a single charging station can be shared between a dedicated disabled parking space and a public PEV charging space (differentiated from a public parking space).

We thank you for the opportunity to submit our comments on this proposed action.

Sincerely,



Guy Hall

President, Sacramento Electric Vehicle Association, Board Member of Electric Auto Association,
Director Sacramento Clean Cities Board.