

From: Peter Mendoza [mailto:thatmendozaguy@gmail.com]
Sent: Tuesday, September 23, 2014 11:14 AM
To: CBSC@DGS
Subject: Proposed E.V.S. Charging Station Regulations

Dear Chair Person Batjer and Members of the Building and Standards Commission.

I am writing to oppose Items 7 and 8, code change proposals from the Department of Housing and Community Development regarding electric vehicle charging station parking. As a person with a disability, who owns a wheel chair accessible ramp van, who resides in Novato, California. I strongly believe the proposed changes will be detrimental and deny equal access under the law.

First, B.S.C. Item #7 is in violation of B.S.C. Criteria 1. The proposed building standards by H.C.D. conflict with existing applicable building standards. Without justification, H.C.D. is proposing parking standards for electric vehicle charging which conflict with standards in Title 24 11A and 11B for accessible parking. H.C.D.'s proposed standards in Item #8 4.106.2.2, as referenced in Item #7, 4.106.2.1, do not provide accessibility standards that would make the parking described in 4.106.2.2 usable by persons with disabilities because this proposed section does not require an accessible route to the charging unit and the required clear floor space for use of the charging unit.

Other parking requirement of 11A and 11B deal with issues other than space requirements and are not discussed in the proposed code. In particular, H.C.D. is eliminating signage requirements that restrict use of the 4.106.2.2 Item 3 parking space to use by persons with disabilities only. Whereas people who do not need accessible parking spaces will have access to all charging parking spaces, persons with disabilities will have access to less than one.

Second, Item 7 is in violation of B.S.C. Criteria 2. The proposed building standards by H.C.D. are outside of the parameters established by Section

504 of the 1973 Rehabilitation Act, The Americans with Disabilities Act, CA Civil Codes 54 and 55, the F.H.A.A., CA Government Codes 4450 and 4452, and Health and Safety Code 19955 because they do not require a dedicated accessible parking space for only persons with disabilities for EV charging or an accessible parking space with its own charger. The proposed code allows a choice between using an accessible 11A parking space accompanied by an inaccessible space described in 4.106.2.2 Item 3 or an inaccessible space on an accessible route. These last option is outside of the parameters of the laws listed above.

Electric Vehicles are the way of the future and are going to become common place in our society. It is pivotal that E.V.S. charging station regulations take into account the accessibility needs of people with disabilities, who just like those with out disabilities, will be using these vehicles in their every day life.

Thank you for your consideration,

Cordially,

Peter T. Mendoza

415 879 5324

This email was typed using voice activated software.

Please forgive typographical and syntax errors.