

From: Barnonhill@aol.com [mailto:Barnonhill@aol.com]
Sent: Monday, September 22, 2014 10:38 PM
To: CBSC@DGS
Cc: cdr-membersXchange@yahoogroups.com; hdlil@comcast.net
Subject: Comments on HCD Items 7 & 8

To: Building Standard Commissioners
From: Susan Chandler, President
CDR--Californians for Disability Rights, Inc.
1193 17th St, Los Osos, CA 93402
Date: September 19, 2014 at 12:19:00 PM PDT
Subject: Comments on HCD Items 7 & 8

Dear Commissioners:

CDR is opposed Items 7 and 8, code change proposals from the Department of Housing and Community Development regarding electric vehicle charging station parking because they will keep people with disabilities from being able to use electric vehicles. There are already, thousands of electric vehicle charging stations that have been installed in CA that are not accessible and usable by people with disabilities. This is blatant discrimination and needs to stop NOW!

We defer to Attorney Sid Cohen, a disability rights attorney for 25 years, who has outlined the illegalities of the HCD proposed codes in a letter he has sent you and ask that you carefully consider all of his comments including:

"The problem . . . is that the location of the charging stations and services are in fact parking spaces that are subject to applicable federal ADA statutes, implementing regulations and standards and applicable California statutes, implementing regulations and standards **that require 1 dedicated parking space for every 25 spaces, but not less than 1** for as long as it takes the parked vehicle to charge, which may be for an extended period of time." ... Further, Sid states, ...**"equal access" would require that each and every charging station comply with the parking space accessibility requirements** of the ADA implementing regulations and standards."

BSC Criteria 6. Items 7 and 8 are in conflict with Criteria 6 which states the proposed code cannot be unnecessarily ambiguous or vague.

4. BSC Criteria 7. HCS's Items 7 and 8 are in conflict with BSC Criteria 7 because they do not incorporate national specifications and published standards for parking.

Please do not approve Items 7 & 8 under consideration by the Building Standards Commissioners.

Thank you for your consideration in making the Electric Vehicle Charging stations accessible to all citizens! Many people who do not use wheelchairs but use the DP spaces are going to electric powered vehicles and need to have access to the charging stations.

On behalf of older citizens, as well as all people with disabilities!

Sincerely, Susan Chandler
