

From: Timothy Thimesch [mailto:tim@thimeschlaw.com]

Sent: Thursday, September 11, 2014 10:13 AM

To: Huff, Shawn@HCD; Castellanos, Stephan@DGS; McGowan, Jim@DGS; Corelis, Dennis@DGS

Cc: HollLynn; walter park; richardskaff@designingaccessiblecommunities.org; Peter Margen; Barry Atwood (aei-atwood@usa.net); Connie Arnold (ihss_advocate@yahoo.com); Jean Riker (jeanriker@att.net); Johnathan Adler; sjc5143@aol.com

Subject: HCD 2nd 45-day language

Dear Working Group,

Thank you for taking the time. I have a few comments:

- 1) The code should specify that the EVCS must be located at the head of the accessible loading zone, i.e., not just “adjacent to an accessible parking space.” In many configurations, locating the charger immediately in front of the vehicle or to the right would leave no room to maneuver between the head of the vehicle and the station.
- 2) The code also needs to ensure that use of the EVCS does not obstruct the accessible route. I refer to the charging cord that must extend like a clothesline from the charging station to the vehicle, or at least must lay across the floor. As an example, I enclose two pictures of an EVCS found at Chapman College in the City of Orange (in the structure near the bookstore). As you can see, the charging cord and accessible route share the same space, one obstructing the other. Resolving this conflict requires specifying that the accessible route shall not overlap the two accessible clear floor spaces that required for using the EVCS, i.e., next to the EVCS and the vehicle itself.

3) Also, signage requirements should be modified to make clear that use of an electric vehicle does not qualify a user to park in the adjacent disabled space. Without clear signage, I believe users of electrical vehicles without placards will become confused by the adjacent EVCS, i.e., believing that use of an electric vehicle by itself will qualify them to park in the adjacent disabled space. Adding a small sign beneath the existing large international symbol, e.g., with another small international symbol immediately adjacent to the letters EVCS – ought to suffice.

4) I would also echo the comments made by others on how “Option 2” would not ensure that the parking space itself is both compliant and usable.

5) Last, the Commission still needs to resolve the noted issues with regard to timing. Access should not be limited by the extended use of EVCS spaces, e.g., while shopping. The current proposal is not adequate to deal with this issue.

Sincerely,
Tim Thimesch

**photo examples follow on next page*

