



July 14, 2020

Mia Marvelli, Executive Director  
California Building Standards Commission  
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Sacramento, California 95833

Ida A. Clair, AIA, Acting State Architect  
Division of the State Architect  
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**Re: Division of the State Architect – 2<sup>nd</sup> 45-Day Express Terms EVCS Code Change Proposals for EV Charging Accessibility Standards Item 11B.812.7.1 and 11B.13**

Dear Executive Director Mia Marvelli:

The California Electric Transportation Coalition (CalETC), the Electric Vehicle Charging Association (EVCA), ChargePoint, CALSTART, Tesla, EVgo, ABM Industries, and Electrify America respectfully submit the following comments regarding the Division of State Architect's (DSA) 2<sup>nd</sup> 45-Day Express Terms for proposed building code changes for electric vehicle charging station (EVCS) accessibility standards on item 11B.812.7.1 submitted on April 22, 2020 and comments more broadly on 11B.13 submitted in the 1<sup>st</sup> 45-Day Express Terms on March 20, 2020.

The Coalition supports the modification proposed for 11B.812.7.1 in the 2<sup>nd</sup> 45-Day Express Terms as it enables greater flexibility in how an EVCS can provide fair and equal access in small EVCS facilities of four parking spots or fewer. DSA's proposed modification allows access aisles to be located on either side of non-angled van accessible spaces and allows two adjacent accessible spots to share an access aisle. Without this change, DSA's 1<sup>st</sup> 45-Day Express Terms proposed in Item 11B.13 would be economically infeasible for smaller EVCS facilities with different charging levels and/or connector types. For example, in a three-parking spot EVCS with two Direct Current Fast Chargers (DCFC) with two different connector types and one Level 2 charger, DSA's 1<sup>st</sup> 45-Day proposed change would increase the current requirement from one van accessible spot to three van accessible, so that accessible spots make up the entirety of the EVCS and require a roughly 50 percent increase in the total square footage required. As such, the initial proposal would result in a meaningful reduction in the provision of small EVCS in California, which have an important role to play in heavily urbanized areas of California where space is at a premium and local emission reductions are critical. DSA's 2<sup>nd</sup> 45-Day Express Terms attempt to mitigate this issue by allowing greater flexibility in how an EVCS can provide fair and equal access in small EVCS facilities. Importantly, the shared access aisle

would reduce the total area lost and thus result in a slightly more economical facility that still provides fair and equal access.

Despite our support for the proposed modification in the 2<sup>nd</sup> 45-Day Express Terms, the Coalition reiterates statements made in several previously submitted comments requesting additional study for the proposed changes on Item 11B.13 of DSA's 1<sup>st</sup> 45-Day Express Terms which impact the economic viability of EVCS of all sizes, whether small or large. Providing fair and equal access in EVCS is imperative to the Coalition and broader EV community. How best to provide fair and equal access while also managing climate goals in a rapidly changing and evolving industry requires thoughtful consideration, analysis, and stakeholder engagement. The modifications to the proposed language in the 1<sup>st</sup> 45-Day Express Terms for 11B.13 and the 2<sup>nd</sup> 45-Day Express Terms have not sufficiently addressed the concerns of this Coalition, those raised by Electrify America in its May 18, 2020 letter, or those conveyed when the Code Advisory Committee recommended further study on this item. Given the far-reaching implications on EVCS of 11B.13, it is vital that this complex issue receive further consideration. As such, the Coalition continues to recommend the proposal for 11B.13 be identified for further study until the next Code Adoption Cycle while a long-term solution is developed by DSA and stakeholders. To not do so would be putting the State's ability to meet its climate goals at risk.

### **Conclusion**

Thank you for the opportunity to provide comments on the 2<sup>nd</sup> 45-Day Express Terms for item 11B.812.7.1 and continuing to consider our recommendations on further study of 11B.13. We look forward to continuing to work with DSA and BSC on building code changes for EVCS accessibility standards.

Thank you for your consideration,

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California Electric Transportation Coalition

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