

McEntyre, John (DES)

From: Thad Curtz <olycrlg@gmail.com>
Sent: Wednesday, October 13, 2021 8:32 PM
To: McEntyre, John (DES)
Subject: Comment on Section 429 proposal for the October 15th Code Council Meeting

External Email

Hi, John. Will you please pass this on to the Council.

Thanks,
Thad

To: The State Building Code Council
Re: Section 429 EV Infrastructure Proposal

Dear Council Members:

As I read Exception 2 for Section 429.3 it works out to the following:

1-9 designated employee spaces = exempted; 10-20 designated employee spaces = 2 actual chargers & 2 EV ready spaces; 21-30 = 3 of each; etc.

OR

Ten to 200 undesignated spaces = 1 actual charger & 1 EV ready space; 201-400 spaces = 2 of each; etc.

I think that this is OK for assembly occupancies, where I think there are generally few people parking for more than a couple of hours and that plugging in will seem like more trouble than it's worth to almost all of them.

However, in educational occupancies, I think that there may well be lots of situations where option 2 produces fewer chargers than option 1 - we might well have 150 spaces for students and considerably more than 10 faculty and staff parking all day, for example, so designated parking might well require 3 chargers and 3 EV ready spaces or more, but the alternative would only require 1 of each.

I think that in manufacturing occupancies, almost all the parking will be all day employee parking. That means that those chargers would be very useful to EV owners, providing a way to do more or less all of their charging, just as residential chargers do. Because they would offer pretty much the same potential support to the electrification of our vehicles and to reaching the State's targets as residential chargers would, I think that those spaces should have the same requirements as residential ones - at least 10% of total spaces should have EV charging stations and 25% of the total spaces should be EV-ready.

Best wishes,
Thad Curtz

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