

California Building Standards Commission  
Attention: Public Comments Triennial Code Update  
2525 Natomas Park Drive, Suite 130  
Sacramento, CA 95833

Delivered via email: [cbsc@dgs.ca.gov](mailto:cbsc@dgs.ca.gov)  
Signatories revised 7/1/2024

Dear CBSC,

We are writing to express concern with the wording of exemptions in the building code section §4.106.4.2.6, regarding mechanical parking. While many of us are competitors, we're united in this letter, asking HCD to exempt mechanical parking from section §4.106.4.2.2.1 of the proposed CalGreen standards:

*§4.106.4.2.2.1*

*§4.106.4.2.2.1.1 Electric vehicle charging stations (EVCS) spaces with EV chargers installed; dimensions and location.*

- 1. The minimum length of each EVCS space shall be 18 feet (5486 mm).*
- 2. The minimum width of each EVCS space shall be 9 feet (2743 mm).*
- 3. One in every 25 EVCS spaces, but not less than one, shall also have an 8-foot (2438 mm) wide minimum aisle. A 5-foot (1524 mm) wide minimum aisle shall be permitted provided the minimum width of the EVCS space is 12 feet (3658 mm). Surface slope for this EVCS space and the aisle shall not exceed 1 unit vertical in 48 units horizontal (2.083 percent slope) in any direction.*

Section §4.106.4.2.6 already exempts mechanical parking systems from EV charging target counts. However: a problem comes in when charging is required by local ordinance, or added voluntarily. Suddenly the above dimensional requirements can come into play on the parking system.

Applying dimensional requirements to mechanical parking strikes at one of the core promises of mechanical parking: storing more vehicles in less space. Having EV specific mandated stall dimensions makes no sense, and cannot be supported by all current or future mechanism designs. Having a California-specific dimension is a bad thing for an industry that operates globally, and a bad thing for California housing consumers in terms of added costs.

The dimensional requirements of §4.106.4.2.2.1 add an unnecessary barrier to voluntary automotive electrification, by complicating and restricting electric vehicle support within mechanical parking structures. The parking lift industry is rapidly innovating, and these rules may hinder, not help, state electrification goals.

We ask HCD and DGS to exempt mechanical access parking from §4.106.4.2.2.1 using the same language as in §4.106.4.2.6. The mechanical parking industry remains committed to accessible design and handling access and EV charging at a facility level, with details differing based on the specific capabilities of the lift design. No additional code language appears necessary.

### **Parking Lift Representatives**

Robotic Parking Systems: Rajeev Aswal, CTO (6/10 email)

Klaus Multiparking USA: Mike Jones, Vice President (June 2024 via phone call)

Harding Autopark Systems/Harding Steel: Scott Bradford: (June 5th 2024 via email)

The Trivial Company: Ernesto Chavarria CEO (June 11th phone call)

Stack Mobility: Santiago Rios, Chief Design Officer (June 11th via Email)  
Lödige USA Inc.: Jonathan Hardy, Director (June 11th via phone)  
Parkworks Mechanical Systems: Grant Shipway Head of Engineering (June 11th via email)  
Utron Parking: Raul Rodriguez Regional Manager West Coast (June 12th via email)  
Parkmatic: Raymond Kahue, Vice President, Marketing and Business Development (12 June email)  
Volley Automation, Bernardo Mendez, Head of Product Management (17 June phone call)

### Architects and Designers

Obviously Enterprises, Berkeley CA. Bryce Nesbitt (Via phone call)  
Watry Design Incorporated, member of IPMI (International Parking & Mobility Institute) and NPA (National Parking Association). David N. LoCoco, [dlococo@watrydesign.com](mailto:dlococo@watrydesign.com) (Via email)

### Referenced Regulatory Action

<https://www.dgs.ca.gov/en/BSC/Rulemaking/2024-Triennial-Cycle/Public-Comments/GREEN-PEME-45>

Comments due via US Mail postmarked no later than July 1st 2024



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