



**CONSORTIUM FOR CITIZENS
WITH DISABILITIES**

January 31, 2022
via regulations.gov

U.S. Department of Transportation
Docket Operations
1200 New Jersey Avenue SE
Washington, DC 20590

Re: Development of Guidance for Electric Vehicle Charging Infrastructure Deployment
Request for Information Docket Number: FHWA-2021-0022

The undersigned Consortium for Citizens with Disabilities (CCD) Transportation Task Force Co-Chairs are pleased to submit these updated comments in response to the Federal Highway Administration (FHWA) request for information regarding development of guidance for electric vehicle charging infrastructure deployment.

Nearly 1 in 5 people in the U.S. has a disability (more than 57 million). In 1990, Congress passed the bipartisan Americans with Disabilities Act (ADA). In enacting the ADA, Congress sought to “provide a clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities.” As a result, 99% of public buses are equipped with ramps, yet significant barriers to accessible, affordable transportation remain across modes.

Without affordable, accessible transportation people with disabilities are unable to travel to work, to school, to contribute to and participate in their communities, to support and spend time with family and friends, and live their lives to the fullest. According to a National Conference on State Legislatures report, in 2012, people with disabilities who were not working reported lack of transportation as one of their biggest barriers to employment. A National Organization on Disability survey found that income remains a barrier to transportation.

Given the current and ongoing barriers to transportation for people with disabilities, it is critical for any new or updated mode and its surrounding facilities to be accessible for all. As you develop the statutorily required EV Charging Program guidance we strongly encourage you to address the needs of disabled drivers and users of electric vehicles, including electric automated driving systems, and charging facilities. We are responding to two of the statutory considerations provided in the RFI.

#4. The need for publicly available EV charging infrastructure in rural corridors and underserved or disadvantaged communities

People with disabilities live in rural areas, underserved and disadvantaged communities which may rely on private and publicly funded transportation services for people with disabilities and older adults. As electric vehicles, both large and small, are utilized in private and publicly-funded fleets it is vital for charging stations to be available in communities that have the greatest gaps in access to mobility.

#9. Any other factors, as determined by the Secretary

We encourage FHWA to reference current Access Board recommendations on EV charging stations in the Architectural Barriers Act standards.¹ The standards advise addressing access to EV charging stations so that they are usable by people with disabilities and recommends providing an accessible route on both sides of the vehicle and adequate vehicle space for a wheelchair accessible vehicle to be paired with the route. We recommend including numbers of accessible EV charging stations in any publicly available lists, or required data collection, and promoting incorporation of accessible EV charging spaces in any grant funding opportunity.

We encourage recommending attendant services be provided at EV charging stations whenever possible, to provide needed service to individuals with disabilities who may not be able to connect the charging apparatus to their vehicle on their own. In addition, we recommend including whether attendant services are available at EV charging stations in any publicly available lists, or required data collection, and promoting the use of attendant services in any grant funding.

We also encourage development and deployment of accessible charging station kiosks or self-service payment machines that are accessible to all disabled travelers. People with disabilities, including wheelchair users, people who are Blind or low vision, Deaf or hard of hearing and people with intellectual disabilities may own their own or be traveling via an electric manually controlled or automated vehicle.

Finally, we encourage FHWA to appoint members of the disability community, including internal USDOT staff, Access Board staff, and outside stakeholders to the Advisory Committee on Electric Vehicles

Thank you for the opportunity to provide comment. We acknowledge and are grateful for USDOT's ongoing commitment to accessible and equitable mobility. Please contact Carol Tyson at ctyson@dredf.org with any questions.

Sincerely,

Sarah Malaier, American Foundation for the Blind

Swatha Nandhakumar, American Council of the Blind

Claire Stanley, National Disability Rights Network

Carol Tyson, Disability Rights Education & Defense Fund

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The Consortium for Citizens with Disabilities (CCD) is the largest coalition of national organizations working together to advocate for Federal public policy that ensures the self-determination, independence, empowerment, integration and inclusion of children and adults with disabilities in all aspects of society free from racism, ableism, sexism, and xenophobia, as well as LGBTQ+ based discrimination and religious intolerance. The CCD Transportation Task Force advances the rights of individuals with disabilities in the area of transportation.

¹ <https://www.access-board.gov/aba/guides/chapter-5-parking/#electric-vehicle-charging-stations>