



MILWAUKEE COUNTY  
DEPARTMENT OF HEALTH  
& HUMAN SERVICES

**AGING & DISABILITIES  
SERVICES**

## **Commission on Aging**

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**Terrence Regan Moore, Sr.**  
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October 24, 2024

Office of General Counsel  
U.S. Access Board  
1331 F Street NW  
Suite 1000  
Washington, DC 20004-111

Submitted electronically.

**Re: ATBCB-2024-0001 Architectural and Transportation Barriers  
Compliance Board notice of proposed rulemaking regarding ADA  
compliance of Electric Vehicle Charging stations.**

To Whom It May Concern,

The Milwaukee County Commission on Aging (Commission) appreciates the opportunity to comment on the U.S. Access Board's proposed 2024 updates to the ADA accessibility guidelines regarding EV charging stations. The Commission appreciates the efforts of the U.S. Access Board to enhance the accessibility of EV charging stations covered by the ADA and those that are federally owned and managed.

Upon review of the Guidelines, the Commission thanks the Board for its consideration of the needs of persons with disabilities and its efforts to ensure equal access to EV charging stations.

In response to the Board's question seeking input on the proposed number of EV charging spaces (four or fewer) which would exempt a site from reserving the accessible space for a person with a disability, the Commission does not believe there is reason to decrease the proposed number of spaces. However, the Commission urges the Board to consider including signage that clarifies the "use last" model, regardless of the number of spaces. It should be clear that the accessible spot is not exclusively reserved for people with a disability only if all other charging stations are in use.

The Commission supports the requirement that 100 percent of EV charges have an accessible user interface.

The Commission supports the Board's intention for EV charging connectors to be operable with one hand in compliance with 309.4.

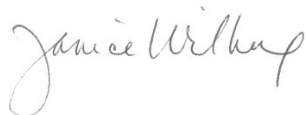
In response to the Board's request for public comment on whether a required length of accessible EV charging spaces should be specified when inductive charging is available, the Commission suggests that the required minimum length should accommodate a van with rear ramp extended plus space for a mobility device user to maneuver.

The Commission supports the "use last model" as an alternative to the "reserved model". The Commission on Aging agrees that a greater number of accessible spaces per EV charging station should be required with the "use last model". Consider using signage indicating the "use last model" at facilities with four or fewer EV charging spaces as well.

The Commission would like to take this opportunity to ask for clarification on the proposed (reserved model) and alternative (use last model) costs. Are the proposed and alternative costs in the cost comparison table accurate? The figure for the alternative is about \$10 million lower than the cost of the proposed rule, but the table indicates a 27.8% cost increase with the alternative compared to the proposed rule.

The Commission remains steadfast in the desire for greater investment in improvements that increase accessibility for older adults and people with disabilities, including investments in transportation infrastructure such as EV charging stations. We urge the Board to continue its efforts to increase accessibility in transportation and to expand its outreach to older adults and individuals with disabilities to ensure that the Guidelines best serve the varied needs of the aging and disability communities.

Sincerely,



Janice Wilberg, Ph.D.  
Chair, Commission on Aging



Brian Peters  
Legislative Officer, Commission on Aging