

Electric Vehicle Charging Stations, Accessibility: FAQs

INTRODUCTION:

The Division of the State Architect's *Electric Vehicle Charging Stations, Accessibility: FAQs* is part of DSA's ongoing effort to promote consistency in the design and construction of projects.

This document addresses five categories of frequently asked questions about new California Building Code accessibility requirements for electric vehicle charging stations:

- General Questions,
- Accessible Route & Path of Travel Questions,
- Scoping Questions,
- Technical Questions, and
- Miscellaneous Questions

The questions are presented as received by DSA or as composites of related questions.

It is important to note that the remarks in this document are intended to be informative but they are not a substitute for the requirements of the California Building Code. Also, despite the informative nature of this document, it is the appropriate jurisdictional code official who possesses the exclusive authority to enforce and interpret the requirements of the California Building Code. This document provides informal assistance regarding California accessibility requirements only for DSA's code-enforcement jurisdiction. The information contained in this document is not binding on the Division of the State Architect and is not intended or designed to give any legal advice on compliance with federal, state, or local laws and regulations. It should be noted that laws, regulations, and standards are subject to revisions, additions, or deletions, at any time.

ABBREVIATIONS:

The following abbreviations are used in this document:

ADA:	Americans with Disabilities Act	EV:	Electric Vehicle
CBC:	California Building Code	EVCS:	EV Charging Station
DCFC:	DC Fast Charge	EVSE:	EV Service Equipment
DSA:	Division of the State Architect		

Note: This FAQ addresses EVCS installed at *public buildings, public accommodations, commercial facilities and public housing*. EVCS installed at *privately-owned multifamily housing facilities* may also have requirements for accessible EVCS dependent on use; please consult with the Department of Housing and Community Development for requirements.

Electric Vehicle Charging Stations, Accessibility: FAQs

GENERAL QUESTIONS:

At what types of property/sites must the ADA requirements be met?

RESPONSE: EVCS installed at public buildings, public accommodations, commercial facilities and public housing are required to comply with the accessibility requirements in CBC Chapter 11B. Also, under the American with Disabilities Act there is a general obligation to provide accessible EVCS; however, specific requirements for EVCS have not been adopted in the ADA Standards for Accessible Design.

What types of exemptions or exceptions exist?

RESPONSE: EVCS installed at public buildings, public accommodations, commercial facilities and public housing are required to comply with the accessibility requirements in CBC Chapter 11B. Compliance with these provisions is not required where EVCS are not available to the general public and intended for use by a designated vehicle or driver (see CBC Section 11B-228.3.2 Exception 1).

Does the state architect intend to provide further statewide guidance or will implementation remain a more regional/local decision?

RESPONSE: The Division of the State Architect will continue its outreach efforts to inform the public about the new accessibility requirements for EVCS. However, the requirements in the CBC are enforced by various code enforcement officials, including city and county building departments, within their respective jurisdictions.

Are multi-unit dwellings of any kind covered under the requirements? Our thinking stemmed from the fact that it covers public housing, but how is public housing defined? For example, is section 8 housing applicable? Are all condos and apartments applicable if they are providing charging for any of their residents and not just a specific resident?

RESPONSE: Privately owned multi-family dwellings are not subject to the new CBC Chapter 11B accessibility requirements for EVCS. The new requirements do apply at public housing facilities which are defined below. CBC Chapter 11B accessibility requirements do not apply to Section 8 housing credit recipients – the Section 8 program is a housing voucher program, not a public housing program.

PUBLIC HOUSING. Housing facilities owned, operated, or constructed by, for or on behalf of a public entity including but not limited to the following:

1. Publically owned and/or operated one- or two-family dwelling units or congregate residences;
2. Publically owned and/or operated buildings or complexes with three or more residential dwelling units;
3. Reserved.

Electric Vehicle Charging Stations, Accessibility: FAQs

- 4. Publically owned and/or operated homeless shelters, group homes and similar social service establishments;*
- 5. Publically owned and/or operated transient lodging, such as hotels, motels, hostels and other facilities providing accommodations of a short term nature of not more than 30 days duration;*
- 6. Housing at a place of education owned or operated by a public entity, such as housing on or serving a public school, public college or public university campus;*
- 7. Privately owned housing made available for public use as housing.*

Electric Vehicle Charging Stations, Accessibility: FAQs

ACCESSIBLE ROUTE & PATH OF TRAVEL QUESTIONS:

Are the elements of path of travel and accessible routes substantively the same (such as slope, vertical clearance, width of path of travel, etc.)?

RESPONSE: The terms ACCESSIBLE ROUTE and PATH OF TRAVEL are distinct but related.

Accessible route is a fundamental term used to describe, “A continuous unobstructed path connecting accessible elements and spaces of an accessible site, building or facility that can be negotiated by a person with a disability using a wheelchair, and that is also safe for and usable by persons with other disabilities...” In short, we can think of it as the ground surface which allows travel by wheelchair. The technical requirements are in CBC Chapter 11B Divisions 3 (Building Blocks) and 4 (Accessible Route). EVCS required by CBC Chapter 11B to be accessible must have an accessible route to the facility entrance (see CBC Section 11B-812.5.1) and an accessible route from the vehicle space to the EVSE (see CBC Section 11B-812.5.2). No exceptions are provided but you can use existing accessible routes to help satisfy these requirements.

Path of travel is a term exclusively used in CBC Chapter 11B within the context of alterations to existing sites (see Section 11B-202.4, including Exception 10). For EVCS projects it only applies where EVCS are installed at existing facilities where vehicle fueling, recharging, parking or storage is a primary function. These types of facilities include gas stations, stand-alone parking lots and stand-alone parking structures (see Section 11B-202.4 Exception 10). When an accessible path of travel is required, an accessible path of travel to the specific area of alteration shall be provided; this path of travel, by definition in Chapter 2 of the CBC, includes a primary entrance to the building or facility, toilet and bathing facilities serving the area of alteration, drinking fountains serving the area of alteration, public telephones serving the area of alteration, and signs as well as accessible routes which connect the area of alteration with site arrival points such as sidewalks, streets, and accessible parking (see CBC Section 11B-202.4). These listed elements – primary entrance, toilet and bathing facilities, drinking fountains, public telephones, signs and site arrival points as well as accessible routes connecting all of them – are sometimes called “path of travel elements.” These elements are required to comply with the current code requirements or be brought into compliance when an alteration occurs. Compliance is required to the maximum extent feasible without exceeding 20 percent of the cost of the work directly associated with the installation of EVCS (see Section 11B-202.4 Exception 10).

When do path of travel and/or accessible routes apply? ...new construction? ...alterations to a parking area? ...alterations to a building associated with parking, such as expansion or remodel?

RESPONSE: In each case EVCS required to be accessible must have an accessible route to the facility entrance (see CBC Section 11B-812.5.1) and an accessible route from the vehicle space to the EVSE (see CBC Section 11B-812.5.2).

Electric Vehicle Charging Stations, Accessibility: FAQs

In the new construction of a new facility, all accessible rooms and spaces are required to be connected by an accessible route and all toilet facilities, drinking fountains, public telephones and signs are subject to accessibility requirements. These fundamental requirements provide accessibility in excess of that required for alterations to existing facilities so the regulations associated with path of travel requirements are not applicable to new facilities.

In general, when alterations are made to existing buildings or facilities, an accessible path of travel to the specific area of alteration shall be provided; this path of travel includes a primary entrance to the building or facility, toilet and bathing facilities serving the area of alteration, drinking fountains serving the area of alteration, public telephones serving the area of alteration, and signs as well as accessible routes which connect the area of alteration with site arrival points such as sidewalks, streets, and accessible parking (see CBC Section 11B-202.4). In general, these listed elements, if provided on the site, are required to comply with the current code requirements or be brought into compliance when an alteration occurs. In the context of EVCS, this scheme will apply when EVCS are installed at existing facilities where vehicle fueling, recharging, parking or storage is a primary function. These types of facilities include gas stations, stand-alone parking lots and stand-alone parking structures. Compliance is required to the maximum extent feasible without exceeding 20 percent of the cost of the work directly associated with the installation of EVCS (see Section 11B-202.4 Exception 10).

Where EVCS are installed at facilities where vehicle fueling, recharging, parking or storage is NOT a primary function, compliance with Section 11B-202.4 is NOT required (see Section 11B-202.4 Exception 10). These types of facilities include shopping centers, individual stores and office buildings. While parking is frequently provided at these types of facilities, parking is not the primary function – shopping or conducting business is the primary function at these facilities.

There is some confusion about whether the “accessible path” that is required means there must be an accessible path from the EVSE (charger) to the facility/building at which the station is installed, or whether the accessible path is just from the parking spot to the EVSE (charger). If the prior is enforced, it could increase the costs of installing EVSE in some instances. What is the correct interpretation of “accessible path”?

RESPONSE: The term used in the CBC is “accessible route.” EVCS required by CBC Chapter 11B to be accessible must have both, an accessible route to the facility entrance (see CBC Section 11B-812.5.1) and an accessible route from the vehicle space to the EVSE (see CBC Section 11B-812.5.2).

What occupancies are or are not subject to path of travel and/or accessible routes? ...buildings subject to California Building Code (CBC) Chapter 11B? ...multi-family buildings subject to CBC Chapter 11A? ...others?

RESPONSE: Buildings and facilities required to comply with Chapter 11B, including public housing facilities, are required to comply with the CBC Chapter 11B accessibility provisions for EVCS. This includes the accessible route requirements for installation of

Electric Vehicle Charging Stations, Accessibility: FAQs

EVCS. In addition, an accessible path of travel is required where EVCS are installed at existing facilities where vehicle fueling, recharging, parking or storage is a primary function. These types of facilities include gas stations, stand-alone parking lots and stand-alone parking structures. Compliance with path of travel requirements is required to the maximum extent feasible without exceeding 20 percent of the cost of the work directly associated with the installation of EVCS (see Section 11B-202.4 Exception 10). See note on page 1 of this FAQ for privately-owned multifamily housing facilities subject to CBC Chapter 11A, and under the regulatory authority of the Department of Housing and Community Development.

If a property owner hits the 20% cost cap on path of travel improvements when installing charging stations, are there any other accessibility site retrofits that would still be required?

RESPONSE: EVCS required to be accessible by CBC Chapter 11B must have both, an accessible route to the facility entrance (see CBC Section 11B-812.5.1) and an accessible route from the vehicle space to the EVSE (see CBC Section 11B-812.5.2). No exceptions are provided but you can use existing accessible routes to help satisfy these requirements. These requirements are separate from, and are not limited by the 20% cost cap on path of travel improvements.

When a property owner hits the 20% cost limitation on path of travel improvements, the jurisdictional entity cannot require further improvements to the path of travel to occur. The property owner should be advised, however, that for older facilities that pre-date the ADA, barrier removal is required by the ADA. Barrier removal, however, will not be enforced by the local jurisdictional entity.

Electric Vehicle Charging Stations, Accessibility: FAQs

SCOPING QUESTIONS:

Can a single EV charger service two EV Accessible spots or does each spot have to have its own charger?

RESPONSE: A single multiport EV charger that can simultaneously charge two vehicles can be used to serve two EV spaces required to be accessible. An EV charger that can only charge one vehicle at a time cannot be used to serve two EV spaces required to be accessible. (see CBC Chapter 2 definition of “Electric Vehicle Charging Station”)

How can we address locations that do not have excess parking spaces and currently, cannot pass through plan check because the code says it's now a “charging space” not a “parking space”? With the current requirements, you need more Van Accessible and ADA reserved parking spaces than required under code with the combination of EV charging and standard spaces. It puts an impossible burden on small parking lots in Irvine and San Diego which are strictly enforcing the interpretation of charging spaces.

RESPONSE: All work is required to comply with the applicable codes, standards and ordinances. Parking ordinances are typically adopted within each city and county in California. Consistent with the state's policies on electric vehicles, DSA encourages city and county officials to recognize the necessary impact of EVCS and adopt responsive ordinances consistent with the local needs.

Can you upgrade/expand an existing location without adhering to ADA standards?

RESPONSE: No. To the extent that EVCS are a public accommodation or commercial facility they are covered by the federal law of the Americans with Disabilities Act. The new accessibility requirements in the CBC are intended to provide full compliance with the requirements of the ADA. Compliance will help property owners meet their legal obligations under the ADA and avoid costly legal actions.

Many properties do NOT have enough electricity available to support significant charging installations, so for now, utilities and others are doing “make ready” spaces (upgrading the supporting infrastructure in a parking space for future use without adding the actual charger). How would make ready spaces comply with the ADA standards? Additionally, consider a site with 10 make ready spaces. Would the standards apply differently if that site has no chargers presently installed versus having one active charger installed?

RESPONSE: The CBC definition for Electric Vehicle Charging Station (EVCS) describes “One or more electric vehicle charging spaces served by an electric vehicle charger or other charging equipment.” Where a vehicle space is not provided with a charger it is not, by definition, an EVCS. CBC Chapter 11B accessibility provisions only apply to vehicle spaces with a charger.

If the entire project consists of 10 vehicle spaces with the infrastructure installed, but

Electric Vehicle Charging Stations, Accessibility: FAQs

without chargers, then CBC Chapter 11B accessibility provisions do not apply.

If the entire project consists of 9 vehicle spaces with the infrastructure installed, but without chargers, and one other vehicle space is provided with a charger, then the CBC Chapter 11B accessibility provisions apply only to the vehicle space with a charger.

It would be prudent for a designer to take into consideration the space requirements necessary for accessible EVCS based on the total projected number of EVCS planned for the site, in addition to future accessible route requirements, so that the future installation of EVCS can be accommodated, but accessibility provisions are not required unless electric vehicle charging equipment is installed.

For a new public building, if EV charging equipment is not installed at this time, what is the extent of the infrastructure that an installer is required to show for plan check review?

RESPONSE: Plans and specifications must accurately describe the full extent of the work to be performed. Some enforcement jurisdictions (primarily city- and county building departments) may have additional requirements.

Looking at Cal Green 5.106.5.3, we must provide the conduits and panel capacity for future installation for the required number of spaces (2 in this case). However, it is only when the equipment is to be installed that we need to refer to CBC and CEC. Section 11B-228.3.1 also reiterates this. Therefore, we would show the location of the conduit stub outs adjacent to 2 current parking spaces and would show space on the electric panel for the future equipment – and that is all. At this time, we do not need to show the requirements for EV accessibility when equipment is installed per Chapter 11B. Is my interpretation correct?

RESPONSE: CBC Chapter 11B accessibility provisions for EVCS apply when a project consists of one or more electric vehicle charging spaces served by an electric vehicle charger or other charging equipment. Where the project does not provide charging equipment the code does not require the provision of accessible routes or other vehicle space accessibility requirements. However, it is good practice to notify the owner or owner's representative of any additional code requirements that will be triggered by the later installation of charging equipment. The owner can use this information to determine the sequence and extent of work to be included in each phase of the project.

All work is required to comply with the applicable codes and standards. Plans and specifications must accurately describe the full extent of the work to be performed. Some enforcement jurisdictions (primarily city- and county building departments) may have additional requirements.

We are also being asked to show the future space for the 1 Van accessible EV space that would be required in the future, if the equipment was installed. And due to the requirement for the access aisle beside this space, in the future it would be converted to an access aisle resulting in the loss of one parking space. As this project is right at the required number of parking spaces per zoning, it is not acceptable to the zoning reviewer to sign off on a plan that shows a "future

Electric Vehicle Charging Stations, Accessibility: FAQs

access aisle for future EV van accessible charging space,” as they are approving the loss of a parking space, even though this would not happen until a future condition, upon which I assume there would be some review process for installation of EV charging equipment. What is the appropriate path forward in this situation?

RESPONSE: All work is required to comply with the applicable codes, standards and ordinances. Parking ordinances are typically adopted within each city and county in California. Consistent with the state’s policies on electric vehicles, DSA encourages city and county officials to recognize the necessary impact of EVCS and adopt responsive ordinances consistent with the local needs.

On existing locations when we add an EV station as van accessible how do we address taking two spaces from the facility (losing a space) and then not having the mandatory spaces remaining for the facility?

RESPONSE: All work is required to comply with the applicable codes, standards and ordinances. Parking ordinances are typically adopted within each city and county in California. Consistent with the state’s policies on electric vehicles, DSA encourages city and county officials to recognize the necessary impact of EVCS and adopt responsive ordinances consistent with the local needs.

I fully support ADA requirements and the DGS' efforts. We are reconstructing a 325 space parking lot. 8% will be EVSE ready. 32 EVSE will be installed initially. Including EVSE required ADA spaces, new plan results in 322 spaces. Parking facility no longer complies with minimum parking requirements for facilities. Any suggestions for resolving this conflict for reworking of existing sites subject to CALGreen?

RESPONSE: Parking ordinances are typically adopted within each city and county in California and enforced by local planning department personnel. You could consider requesting a variance from full compliance with the parking requirements substantiated by the benefits of electrical vehicle use which relies on installed infrastructure.

There does not seem to be a distinction between different EVCS standards (Level 1, Level 2, DC CHAdEMO, DC CCS, and Tesla). Does the schedule defined in Table 11B-228.3.2.1 make a distinction between the different types of EVSE standards or are that all considered to equivalently be an EVCS?

RESPONSE: The CBC Chapter 11B accessibility requirements for EVCS do not distinguish between the different EVCS standards like those listed. However, building officials may view different types of service as separate facilities. Where different types of EVCS service are provided at a location, the code enforcement official must determine the applicability of Table 11B-228.3.2.1.

When developing the CBC Chapter 11B accessibility provisions for EVCS, it was DSA’s intent to provide a reasonable portion of all EVCS facilities as accessible to and usable

Electric Vehicle Charging Stations, Accessibility: FAQs

by persons with disabilities.

We often see projects of gas station replacing old fuel dispensers with access compliance fuel dispensers (reach range, operable parts, point-of-sale). According to Section 11B-202.4, Exception 10, these projects would be required to comply with accessibility for primary accessible path to inside the convenient store at the gas station, public restrooms, drinking fountains, public telephones, and signs (with 20-percent limit of adjusted construction cost). Is my understanding correct regarding the replacement of old/addition of new fuel dispensers?

RESPONSE: Exception 10 to Section 11B-202.4 is only applicable to the installation of EVCS – the exception does not apply to gasoline filling equipment. However, Section 11B-202.4 Exception 8 may be used when replacing gasoline fuel dispensers.

Is DSA aware of existing precedents (potentially from past experience with non-EV accessible parking) to address the factors that would be considered to determine whether compliance with EV accessibility rules would be technically infeasible?

RESPONSE: A request for technical infeasibility is made to and determined by the local jurisdiction. A request for technical infeasibility is site-specific; therefore, there are no general factors that could be considered to determine whether compliance with EVCS regulations is technically infeasible.

Electric Vehicle Charging Stations, Accessibility: FAQs

TECHNICAL QUESTIONS:

For small parking lots, is there any variance on being able to share EV charging with the existing accessible parking spaces?

RESPONSE: The accessibility provisions in CBC Chapter 11B do not permit a required accessible EVCS to be installed in a required accessible parking space. Section 11B-208.1 notes, "For the purposes of this section, electric vehicle charging stations are not parking spaces..."

Can you put an EV charger in an existing accessible parking space instead of doing costly upgrades?

RESPONSE: The accessibility provisions in CBC Chapter 11B do not permit a required accessible EVCS to be installed in a required accessible parking space. Section 11B-208.1 notes, "For the purposes of this section, electric vehicle charging stations are not parking spaces..."

Currently, the DCFC time limit is 30 minutes maximum. New larger battery capacity will take longer to get 80% charge – i.e. Chevy Bolt EV, Tesla Model 3, 2018 Nissan LEAF, etc. Can we reconsider the time limit?

RESPONSE: The 30 minute time limit applies to drive-up EVCS of any type. This design option allows brief charging and queuing for charging service, and does not consider that batteries will be charged to full capacity. Where DCFC or any other type of charging is intended for use longer than 30 minutes, EVCS may be provided in regular parking-style vehicle spaces.

CAL Green requires x number of EVSE per xxx number of spaces - each on its own 40 amp circuit. Some dual EVSE are on a single 40 amp circuit and split the 40 amp. Does this mean that half of those plugs don't comply with the required number?

RESPONSE: The California Green Code appears to require service panels, sub-panels, and raceway of sufficient capacity to accommodate 40 amp circuits rather than mandating one 40 amp circuit for each EVCS in residential and nonresidential locations. For additional information you may contact the Department of Housing and Community Development for infrastructure requirements at residential locations or the Building Standards Commission for infrastructure requirements at nonresidential locations.

Can you provide recommended signage for ADA accessible spaces?

RESPONSE: Required identification signs for accessible EVCS vehicle spaces are indicated in CBC Chapter 11B Section 11B-812.8 and required vehicle space surface markings are indicated in Section 11B-812.9. Other courtesy messages may be provided

Electric Vehicle Charging Stations, Accessibility: FAQs

but are not required by CBC Chapter 11B.

For projects within the public rights-of-way, the California Department of Transportation (Caltrans) has several signs for EV charging in its California Manual on Uniform Traffic Control Devices. For the appropriate use of these signs you may contact Caltrans.

What are the auditory/braille requirements for EVCS units with a touch screen?

RESPONSE: Accessibility requirements for all point-of-sale devices have been a part of the CBC for many years and allow people with vision impairments to conduct automated transactions in a secure manner. These requirements apply to point-of-sale devices in public buildings, public accommodations commercial buildings and public housing, including restaurants, stores, banks, theaters and DVD rental kiosks – just about anywhere the public conducts automated transactions.

The new CBC accessibility requirements for EVCS specifically identify that each EVCS, whether or not accessible, provided with a point-of-sale device must provide a tactilely discernable numerical keypad, like a push-button telephone keypad or some other technology such as RFID, biometric fingerprint or other mechanism that allows access and privacy (see CBC Section 11B-707.9.1).

Where EVCS are provided with a touch screen but without point-of-sale devices, neither the CBC nor the ADA Standards for Accessible Design provide explicit requirements for the touch screen accessibility. However, Title III of the ADA prohibits discrimination against individuals "...on the basis of disability in the full and equal enjoyment of the goods, services, facilities, privileges, advantages or accommodations of any place of public accommodation..." (see 42 U.S.C. § 12182(a)) Past court cases have indicated that accessibility must be provided at places of public accommodation and governmental programs and services, even in the absence of explicit requirements. Accordingly, DSA advises that designers incorporate touch screen accessibility into their projects.

Electric Vehicle Charging Stations, Accessibility: FAQs

MISCELLANEOUS QUESTIONS:

Can a disabled non-EV driver park in an ADA EVSE spot?

RESPONSE: The California Vehicle Code prohibits parking a vehicle in an EVCS. Vehicles left in EVCS spaces must be connected for charging purposes. DSA understands this applies to accessible EVCS too.

Will CALGreen be amended to require that some parking spaces are designed so that they can comply with Chapter 11B requirements when converted to EV charging spaces (i.e. slope, vertical clearance, path of travel)?

RESPONSE: DSA is not aware of any efforts to amend the California Green Code in this manner. While the California Green Code nonresidential mandatory measures require projects to identify an EV space, provide an electrical raceway to the service panel, and provide adequate capacity at the service panel for future EVCS; good design practice would be to incorporate appropriate ground surfaces and routes to facilitate the later installation of usable accessible EVCS. Plans and specifications must accurately describe the full extent of the work to be performed. Some enforcement jurisdictions (primarily city- and county building departments) may have additional requirements.

What accessibility requirements apply to EV charger installation outside of California?

RESPONSE: To the extent that EVCS are a public accommodation or commercial facility they are covered by the federal law of the Americans with Disabilities Act. Specific technical requirements for EVCS are not specified in the 2010 ADA Standards for Accessible Design. DSA is not familiar with state and municipal accessibility requirements for EVCS outside of California.

Has there been consideration for electric vehicles being parked in valet mode that could share EVSE and meet the equivalent EVSE option? This could reduce the cost of construction and major electrical upgrades.

RESPONSE: Electric vehicles may be parked by a valet just as any other car. CBC Chapter 11B does not contain specific accessibility provisions for situations where the valet service provides EV charging in addition to parking service. Absent specific requirements, this situation would require the building official to determine the extent of applicable accessibility requirements on a case-by-case basis. DSA encourages designers to consult with jurisdictional building officials (primarily city- and county building departments) whenever there is a question of code interpretation or application.

It appears that the accessibility standards may result in lots of chargers in ADA spaces not being used or “stranded assets.” Was this issue addressed in development of the standards?

Electric Vehicle Charging Stations, Accessibility: FAQs

RESPONSE: This issue was discussed extensively during development of the CBC Chapter 11B accessibility provisions for EVCS. The requirements were developed to provide full compliance with federal and California accessibility law without placing an excessive burden on the property owners.

Vehicle spaces which display the International Symbol of Accessibility (ISA), sometimes referred to as the wheelchair symbol, are generally understood to be reserved for the exclusive use of a disabled person displaying special license plates or a distinguishing placard. It is important to remember that a disability placard or special license plate with an ISA can be issued to a driver or passenger for a disability that does not necessitate the use of a wheelchair or mobility device; therefore it is incorrect to assume that an accessible EVCS will be underutilized, because disability placard holders may have an electric vehicle or may purchase one in the near future.

For EV with the charging port at rear of the vehicle, can EV be assumed to be able to back in the parking space for easy access to the charger at the head location?

RESPONSE: This practice is not regulated by the CBC Chapter 11B accessibility provisions. DSA is not aware of any restrictions on this practice.

Are the ADA spaces ADA-only? Vans only in Van accessible spaces?

RESPONSE: Standard accessible and van accessible EVCS vehicle spaces which display the International Symbol of Accessibility (ISA), sometimes referred to as the wheelchair symbol, are generally understood to be reserved for the exclusive use of a disabled person displaying special license plates or a distinguishing placard.

Van accessible EVCS vehicle spaces which display the ISA are not reserved for vans only. They may be used by a disabled person with a standard vehicle or van displaying special license plates or a distinguishing placard.

What is best way to provide accessible curb-side EVCS (like parallel parking)?

RESPONSE: Though the building code does not regulate EVCS in the public right-of-way, accessibility is still required under the federal Americans with Disabilities Act. Since there are no explicit regulations it will be up to you to provide an accessible solution which is acceptable to the jurisdictional authorities. You may wish to refer to the new CBC Chapter 11B provisions as "guidelines" because they were crafted to address vehicle spaces that are parallel to the vehicular way as well as the more traditional pull-in space. In this case, you would apply the general requirements to curbside locations. Note that an explicit exception is provided in Section 11B-812.10.4 Exception 3.