



**MEMO**

**Date:** June 23, 2022  
**To:** Ingrid Fish and Marty Stockton  
 Bureau of Planning and Sustainability  
**From:** Kimberly Tallant  
 Bureau of Development Services  
**Re:** BDS Comments on Electric Vehicle Ready Code discussion draft

Thank you for the opportunity to review and comment on the EV Ready Code. This project provides mechanisms to required electric vehicle charging and can add larify for how this type of infrastructure and development is regulated.

The comments below highlight our primary areas of concern and provide detailed comments on the proposal. We look forward to working with BPS staff to address our concerns and to providing additional feedback as the project develops. Please direct questions about these comments to Matt Wickstrom at [matt.wickstrom@portlandoregon.gov](mailto:matt.wickstrom@portlandoregon.gov) and Tom Soppe at [Thomas.Soppe@portlandoregon.gov](mailto:Thomas.Soppe@portlandoregon.gov) on my staff.

**Primary Areas of Concern**

*Potential Implementation Issues*

1. There is some concern with an increase in Adjustment reviews related to placement of charging equipment in required perimeter landscaping.

**Detailed Comments**

We offer the following additional detailed comments.

Item No.	Page	Code Section	Comment
1	Section IV, page number TBD	33.120.210.B.1/ 33.130.205.B.1	consider including similar FAR exemptions for development in the EX zone under 33.140.205. The use mix and development types we see in the EX zone are similar to those in the higher intensity C/MU and RM zones. Since the EV requirements under 33.266.110.D will apply to development in the EX zone as well, it may make sense to allow those developments to benefit from FAR

Item No.	Page	Code Section	Comment
			exemptions consistent with similar development in C/MU and RM zones.
2	33	33.266.130.H.1	Consider allowing chargers (or perhaps equipment also) in required perimeter landscaping areas to encourage proposing them, to avoid possible numerous Adjustments related to allowing them in these areas, and to make it easier for smaller, constrained, and/or existing sites. Specifically allowing exemptions for smaller, constrained, and/or existing sites may make sense if this section is otherwise retained in the draft.
3			On Line 24 in the working EV Ready Code Project Comment/Edit Tracker Excel, the EV Ready Code Team Response asks what other electrical equipment we are referring to in our original comment in this line. The answer to that is really just referring to the charger itself, so if this is not required to be screened per the wording of 33.266.130.H.3 then the issue is moot. But the proposed section could be clarified that equipment associated with the chargers doesn't include the charger itself.