

# Noelani Derrickson

**#331907 | June 17, 2022**

Testimony to on the **EV Ready Code Project, Discussion Draft**

Tesla comments submitted in the attachment.

Testimony is presented without formatting.



June 17, 2022

Portland Bureau of Planning and Sustainability  
Attn: Ingrid Fish, Marty Stockton  
1900 SW 4th Ave  
Portland, OR 97201  
VIA EMAIL: [Ingrid.Fish@portlandoregon.gov](mailto:Ingrid.Fish@portlandoregon.gov)  
[Marty.Stockton@portlandoregon.gov](mailto:Marty.Stockton@portlandoregon.gov)

Dear Ingrid Fish, Marty Stockton:

Tesla appreciates the opportunity to provide comments on Portland's Electric Vehicle (EV) Code Discussion Draft. We recognize Portland's collaborative efforts with the Department of Land Conservation and Development, the State Building Code Division, and other stakeholders in designing and implementing codes to accelerate EV adoption. Tesla supports several proposed code changes to establish EV readiness for parking spaces in new multi-dwelling developments and efforts to reduce EV charging permitting and zoning restrictions. Additionally, we provide comments and recommend modifications to proposed restrictions on EV charging stations, such to equipment locations and screening requirements.

### **Multi-Dwelling Developments**

Tesla supports code proposals to expand past the 20% minimum requirements in House Bill 2180 through amendments to the Portland City Zoning Code (Title 33). Specifically, the Discussion Draft's focus on requirements for new multi-dwelling developments is important given that existing multi-dwelling developments are often the most challenging and expensive to retrofit with EV charging. We support the requirement for 50% of on-site parking spaces in a new multi-dwelling development to be EV-ready, meaning including electrical capacity and conduit to support at least Level 2 EV charging. Notably, for new buildings, a minimum of Level 2 EV charging is important to minimize range anxiety and adequately serve drivers. These requirements align with recent building codes adopted in California and Washington for multi-dwelling developments.

### **Alterations Allowed Without Conditional Use Review**

Tesla strongly supports clarification that EV charging installations do not trigger conditional use permits or other discretionary permits in all city zones when accessory to an existing use. This clarification is important as EV charging stations must be built in nearly all city zones to support the transition to EVs. Requiring a multi-month



discretionary review process is excessively burdensome for building owners, residents, and charging providers. In addition to allowing EV charging alterations without a conditional use permit in the Discussion Draft's proposed zoning locations, Tesla recommends consideration of similar code application in all other zones in Portland.

### **Parking Count**

Minimum parking count requirements are a significant challenge in Portland and often result in interested property owners turning down adding EV charging stations. Portland should allow parking spaces providing EV charging or associated equipment to equivalently reduce minimum parking count requirements. Similar to the spaces that support car-share, parking spaces providing EV charging or associated equipment should be added as an exemption in 33.266.110.E. This aligns with the intent of the section to reduce minimum parking space requirements in exchange for development that is encouraged by the city. Tesla proposes recommended exemption language in the attached Appendix.

### **Screening and Setback Restrictions**

As detailed in the Discussion Draft, EV charging stations, specifically direct current fast charging (DCFC) stations, typically require associated electrical equipment, such as electrical cabinets and transformers, to supply adequate power to the chargers. This equipment can either be located in existing parking stalls near the chargers or in existing landscaping to minimize parking stall loss. Commercial property owners with strict local parking count minimum requirements often prefer equipment located in landscaping instead of in parking stalls. As previously detailed, property owner rejections of EV charging stations due to minimum parking count requirements are a significant challenge. The Discussion Draft's further restrictions limiting the locations allowed for EV charging equipment and requiring equipment screening would make it significantly more challenging and expensive to provide DCFC in Portland. Tesla strongly recommends reevaluation of the proposed restrictions in 33.266.130.H. based on added costs and additional square footage required. To best accelerate EV charging station build-out and EV adoption, existing and proposed code requirements for EV charging should be limited to health and safety concerns.

### **Drive Through Charging**

At present, Tesla DCFC stations do not operate using a drive-through facility model. EVs charge at a DCFC station while they are parked, typically under an hour. Driver preferences while charging vary between frequenting surrounding commercial amenities, staying in-vehicle for the charging duration, and a mix of both. While occasional vehicle queueing does occur during peak charging times, such as during holiday travel, traditional EV charging stations should not be required to comply with the



proposed requirements of a drive-through facility. The Discussion Draft's proposed code for drive-through EV charging facilities should be careful not to prematurely and inappropriately restrict EV charging stations that do not deploy a drive-through model but may have occasional queuing or drivers choosing to stay in-vehicle during the charging duration.

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We appreciate the opportunity to provide comments on Portland's Electric Vehicle Code Discussion Draft. Tesla looks forward to continued collaboration with Portland and other stakeholders as the Electric Vehicle Code Discussion Draft is updated and implemented.

Sincerely,

Noelani Derrickson  
Sr. Policy and Business Development Advisor  
Tesla



## Appendix

Language to be added is **underlined**

**33.255.110.E. Exceptions to the minimum number of parking spaces.** The minimum number of required parking spaces may be reduced as follows:

1. [No change]
2. Other exceptions. The minimum number of required parking spaces may not be reduced by more than 50 percent through the exceptions of this Paragraph. The 50 percent

limit

applies cumulatively to all exceptions in this Paragraph:

a-e. [No change]

f. Car-sharing parking spaces may substitute for required parking if all of the following are met:

- (1) For every car-sharing parking space that is provided, the motor vehicle parking requirement is reduced by 2 spaces, up to a maximum of 25 percent of the required parking spaces;
- (2) The car-sharing parking spaces must be shown on the building plans;
- (3) The car-sharing parking space must provide at least a Level 2 electric vehicle charger; and
- (4) A copy of the car-sharing agreement between the property owner and the carsharing company must be submitted with the building permit.

g. [No change]

**h. Parking spaces served by electric vehicle charging stations or any associated equipment.**

# Cesar Diaz

**#331906 | June 17, 2022**

Testimony to on the **EV Ready Code Project, Discussion Draft**

Please find the letter with ChargePoint's comments on the EV Ready Code Project attached.

Testimony is presented without formatting.



ChargePoint, Inc.  
254 East Hacienda Avenue | Campbell, CA 95008 USA  
+1.408.841.4500 or US toll-free +1.877.370.3802

June 17, 2022

City of Portland  
1221 SW 4th Avenue  
Portland, OR 97204

**Re: ChargePoint Comments on the City of Portland EV Ready Project Draft Rules**

ChargePoint would like to thank the City of Portland for the opportunity to provide comments on the draft rules related to its zoning code amendments for the EV Ready Code Project. ChargePoint supports the draft proposal the City has put forward and is excited to continue to build out an electric vehicle (EV) charging network in support of Portland's climate emission goals.

ChargePoint is one of the world's largest EV charging networks and solution providers with both Level 2 and direct current fast charging (DCFC) stations on its network. ChargePoint designs, manufactures, and sells networked charging stations and works with major employers, municipalities, utilities, fleet operators, real estate developers, and individual drivers to deploy and operate charging stations across North America and Europe to enable the electrification of transportation.

ChargePoint supported HB 2180 (2021) and is glad to see Portland seek to align with that bill and go beyond the requirements it set statewide. When passing HB 2180, part of the discussion at the state legislature was to allow local communities could go beyond the 20% EV ready mandates set in the bill. We applaud Portland's plan to require the greater of 50% of onsite parking spaces or 100% of six or fewer onsite parking spaces be EV-ready. In order for Oregon to meet its targets outlined in SB 1044 (2019), more charging station availability is needed (see [TEINA study](#)). Bold action from municipalities like Portland, are needed towards meeting those goals.

Please feel free to reach out to me at [cesar.diaz@chargepoint.com](mailto:cesar.diaz@chargepoint.com) at any time, we would be happy to be a resource for the City of Portland as it works on these zoning code amendments or on any other EV charging related issues. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Cesar Diaz". The signature is fluid and cursive, with the first name "Cesar" being more prominent than the last name "Diaz".

Cesar Diaz  
Senior Public Policy Manager, ChargePoint

# Mia Tiwana

**#331905 | June 16, 2022**

Testimony to on the **EV Ready Code Project, Discussion Draft**

Dear Mayor Wheeler and City Commissioners: If adopted in its current form, Portland's Draft EV Ready Code may render the city's EV expansion goals unattainable. I urge you to reject the proposed code changes until three serious defects in the proposal are remedied. Please see attached.

Testimony is presented without formatting.



**Mia Tiwana**Research Associate  
mia@cascadepolicy.org4850 SW Scholls Ferry Rd., Suite 103  
Portland, OR 97225www.cascadepolicy.org  
503-242-0900

June 15, 2022

**Re: EV Ready Code Draft Public Comment**

Dear Mayor Wheeler and City Commissioners:

If adopted in its current form, Portland's Draft EV Ready Code may render the city's EV expansion goals unattainable. **I urge you to reject the proposed code changes** until three serious defects in the proposal are remedied.

**1. The EV Ready Code is unenforceable**

The EV Ready Code draft requires new developments with more than 5 units to build EV charging infrastructure, including conduit and capacity. This is required on 50% of their parking spaces or on 6 spaces —whichever is greater.

But the city's parking mandates make the EV Ready Code easy to avoid. Developers can circumvent the proposed mandates by simply scratching parking off their construction plans. [Under PCC 33.266](#), Portland requires the following parking standards on mixed-use and multi-dwelling housing developments:

# of Residential Units in Development	Parking Requirement	Approximate # of resulting required parking spaces
≤ 30 units	<b>No parking required</b>	<b>0</b>
31- 40 units	1 space for every 5 units	7 - 8
41-50 units	1 space for every 4 units	11 - 13
≥ 51 units	1 space for every 3 units	17+

Only buildings with more than 30 units are obligated to build parking. Developers could scale down their projects to 30 units to avoid parking requirements, and by extension, avoid the additional cost of EV charging infrastructure. Upcoming state policies will further nullify this draft's efforts. Oregon's Land Conservation and Development Commission is [considering the permanent removal](#) of all residential parking requirements next year in many metro areas,

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including Portland. If it happens, developers could build any number of units and provide zero parking.

Recent history shows that when the city required developments over 20 units to make below-market rate units available for affordable housing, multi-family projects over 20 units [became much more scarce](#). Inclusionary zoning policies further strained the housing supply, and this code draft will do the same.

## 2. EV chargers are exorbitantly expensive for developers and renters

The EV Ready Code draft estimates the cost of compliance will amount to approximately \$800 to \$4,700 per parking space. Proponents of the code draft may claim this is a good investment because installing EV charging infrastructure during new construction is cheaper than installing later in completed developments. However, [Johnson Economics'](#) financial analysis, provided in the EV Ready Code draft appendices, states:

*While there are clear cost savings associated with installing infrastructure during initial construction as opposed to a retrofit, providing **EV infrastructure will still entail significant costs.***

But the draft code only mandates putting wires in the ground. On top of this, there is a substantial additional cost to install the chargers themselves—which are not mandated by the draft code. Johnson Economics concludes the cost of providing the charging station would be **\$7,000 to \$10,000 per space**. No matter how it's spun, these costs will be borne by tenants in the form of higher rents or add-on charges, further reducing the city's housing affordability.

Much of the attention has been focused on the effect on new construction, which is associated with higher market rents, in which the cost of complying with the code will represent a small share of total construction costs. However, the costs of compliance for income-restricted projects would be an even bigger share of their total costs. For these projects, the Johnson Economics analysis goes so far as to conclude, “access will not be substantively improved under the proposed code.”

The median rent in Portland's metro area already grew from \$1,618 in 2019 to \$1,932 in 2022, a [20% increase](#). The EV Ready Code will exacerbate this trend.

## 3. Today's EV chargers could quickly become technologically unreliable and obsolete.

The proposed code draft's whole point is “EV readiness,” which intends to establish confidence in those hesitant to buy electric vehicles. But, there's no guarantee that chargers will be installed or maintained. Without the widespread availability of working chargers, potential EV buyers may still consider the infrastructure unreliable. Even after the headache of compliance with the EV Ready Code, there still might not be sufficient EV infrastructure to foster large-scale EV adoption.

One only has to look at [California's Bay Area bout with broken chargers](#), where more than a quarter of chargers are broken or unusable, to see the damage an unreputable charger system has

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on EV market confidence. There are few consequences to developers if their charging infrastructure—that they were forced to install—goes nowhere.

Plus, EV drivers are beginning to prefer and rely on more efficient chargers, sometimes called “Level 3” chargers. More EV manufacturers hope to shrink battery sizes significantly in upcoming years as well. For these reasons, the city-mandated “Level 2” charging capacity could be obsolete within the decade.

Portland **cannot** turn a deaf ear to the risks involved with its EV ambitions. The EV Ready Code Draft is too much, too quick; it’s a risky investment at the cost of Portlanders, and it may never pay off.

Earlier this week, Colorado Governor Jared Polis vetoed a bill similar to Portland’s EV Ready Code Draft. His reasons for vetoing the bill echo the points I’ve made. According to the Wall Street Journal (attached):

*As Mr. Polis noted in his veto message, the bill’s “inflexible mandates” would have made new “housing development and commercial remodels more expensive up front.” They also might not “save money in the long run” as “new technology is brought to scale that allows for less expensive installation” and “charging or vehicular technology changes over time.”*

Please follow Colorado’s lead. Reject the EV Ready Code draft.

Respectfully submitted,

Mia Tiwana

Attachment: WSJ Article: “Jared Polis Bucks the Climate Lobby”

## Jared Polis Bucks the Climate Lobby

Colorado is more progressive than its neighboring Western states. But Democratic Gov. Jared Polis last week said no to becoming California by vetoing a bill that would have required parking lots of new buildings to be wired for electric-vehicle chargers.

The bill would have required developers of new apartment buildings to set aside 20% of parking spaces for EV charging stations. Ten percent of parking spaces at commercial buildings would also have to double as charging stations.

As Mr. Polis noted in his veto message, the bill's "inflexible mandates" would have made new "housing development and commercial remodels more expensive up front." They also might not "save money in the long run" as "new technology is brought to scale that allows for less expensive installation" and "charging or vehicular technology changes over time."

### The Colorado Governor vetoes costly EV charging mandates.

Building-code regulations are a big reason housing in California is so expensive. Solar panels are required on new homes and apartment buildings. New commercial buildings must have "EV capable" parking spaces. Starting next year, commercial buildings and high-rise apartments will also have to be equipped with solar panels and battery storage.

But as Mr. Polis noted, EV chargers could improve and become cheaper in a few years. Those installed today might need to be replaced. That's an especially salient point as the Biden Administration last week released its proposed national EV charging plan for spending \$7.5 billion in last year's infrastructure bill. Government planning typically produces economic inefficiencies. Credit to Mr. Polis for putting his constituents over the climate lobby.

# Lance Killian

## #331904 | June 13, 2022

### Testimony to on the **EV Ready Code Project, Discussion Draft**

Thank you for the opportunity to comment. We are concerned about how much the City is asking for by Spring of 2023. Level 2 chargers are expensive. Asking for 50% in 2023 is taxing and would put additional pressure on the housing supply that is already burdened by other policies. The City EV materials include significant focus on equity and providing EV in low-income areas. These proposed EV requirements would make housing significantly more costly and therefore the less obtainable it becomes for low-income residents. Due to the high cost of construction, new, un-subsidized multifamily projects are typically developed in higher income areas which can command the necessary rents to be financially feasible. How does EV charging in a luxury building, in a private garage help increase EV in low-income areas? Even if they are provided in a new building with inclusionary housing, the monthly cost for the parking space is typically not included in the inclusionary housing unit rent (paid for separately). Parking minimum is not required in many areas of the city. For smaller developments, if a developer is burdened with this cost, why would they include any parking on site if they are forced to provide infrastructure for 50% of spaces when they can build their project with no parking and therefore no EV ready stations are provided. There should also be credit given for Level 1 chargers, where a specific percentage of the required EVs can be Level 1 (i.e. 50% of the EV spaces can be Level 1). Not everyone needs a quick charge, most residents when they are not working are at home for long periods of time (8-12 hours). That is plenty of time to charge to commute the next day (average commute in the US is 25 minutes). This was discussed in the interview section of the report but not addressed in the standards. The city has included costs in the materials, but we believe the costs don't include the cost for switchboards. On a current project we received pricing from our electrical subcontractor for Level 2 charger expenses (on 5/23/22) which are as follows: • Level 2 charging stations range from ~\$4,500 - \$8,000 • Conduit and wiring for each space ~\$2,000 • Note these costs do not include infrastructure such as a switchboard (\$100K) that is needed once you have more than 30 stalls. There are other cost not being considered in the report or above. In the proposed development standards, there are specifications for landscaping requirements for equipment and noted that the accessory electrical equipment and cabinets can't be within the parking space (additional space for equipment = less rentable space or lower efficiency). To put this in context, for a 145-unit mixed use project, assuming 100 parking spaces (just under a 0.7 parking ratio), there would need to be 50 spots. The cost is around \$250K just to be EV ready and another \$225K-400K+ just for the stations (\$475-650K). This does not include any other costs related to the loss of site/building efficiency, etc. Without a subsidy this equates to approximately \$13,000/EV stall of additional cost. Has the City

reviewed this with PGE? Is there enough power in PGE's grid to support the proposal in 2023? How can the City help developers navigate this requirement with PGE, as otherwise there may be other hidden costs in infrastructure upgrades and timing delays, etc. which further complicate the development process and slow down housing production. Please take into consideration the true cost (without subsidy) of the proposed EV Ready Code Project to housing production, equity, and affordability. If there are new requirements (as opposed to the market dictating), there needs to be more incentives for the reasons stated above.

Testimony is presented without formatting.

# Tamara Holden

## #331901 | June 3, 2022

### Testimony to on the **EV Ready Code Project, Discussion Draft**

- Give developers the opportunity to waive in portion or entirely the EV infrastructure requirements by demonstrating that the goal of reducing greenhouse gas emissions is being achieved elsewhere factoring in market conditions, carpooling, incentive programs to use public transportation or bicycle, availability of vehicle charges nearby the subject site, and obtaining energy certifications that are more impactful than the EV-ready goals.
- There needs to be flexibility in the EV ready program to consider future possibilities and new technology. For example, in five years, there could be city-owned vehicle car charger stations on every city block. Someday, multifamily buildings could have battery charging amenity rooms.
- Other City priorities, such as building homeless shelters and transitional housing, should be considered. If the added cost of the infrastructure creates a financial burden, then exceptions should be made.
- The City should also consider lowering or eliminating the 1.5% City tax on electric usage to offset the ongoing owner maintenance and monitoring of vehicle chargers.
- Allowing shared charging option would give developers more flexibility on how to implement EV charging.

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# Suzannah Stanley

## #331898 | May 25, 2022

### Testimony to on the **EV Ready Code Project, Discussion Draft**

1. NCUs – can the cost of the charger and equipment count toward NCU expenses, if redoing a parking area and landscaping? It is not on the list of the menu of eligible/required upgrades (33.258.070.D.2.b.) but could be done as part of parking lot landscape upgrades. A note like “The cost of electric vehicle chargers and accessory equipment can contribute to the cost of the required improvements, but is not required for full conformance” (like under 2.d.(1)) maybe. 2. H.1.—this could be tricky. We often see charging stations within landscaped areas. 3. Instead, how about Parking area setbacks and landscaping (33.266.130.G.)—G.2. perimeter: these should be allowed to encroach into the minimum setback set by Table 266-5. Otherwise we would have jogging/sawtooth 5-7'+ setbacks (or 10-12'+ setbacks) at the edges of parking areas which would disrupt parking spaces and drive aisles. 4. G.3. interior landscaping—similarly, if charging stations are added to spaces on the interior of the parking area, would be great to clarify that paved areas for electric vehicle chargers and accessory equipment can count toward the required interior landscaping. (how about for 3.b. “The landscape materials must comply with the P1 standard of Chapter 33.248, except electric vehicle chargers and accessory equipment can also be within the interior landscaped area”?) 5. 33.266.130.H... “tall enough to screen the equipment” is a tricky one to measure on a landscaping plan, and plant material is not tall enough when first planted. Do you know how tall this equipment generally will be? If the rest of the parking area is screened with L2 (with a 3' high evergreen hedge), would you have a 2' wide spaces where there was a 5' high hedge, in front of the transformer? That sounds like it would look worse than just having a small transformer sticking out. 6. Clarification of use vs. development type. Your code explains that a drive-through is not a use on its own, but a development type (the use is the bank or restaurant or gas station or whatever). In 33.920.220 you explain that electric vehicle charging stations are an example of a Quick Vehicle Servicing use, but “Electric vehicle chargers that are intended to be used while the car is parked in a parking space are not a Quick Vehicle Servicing use.” In the latter situation... what are they? Accessory to the primary use? Or are they not uses at all, but part of the development like a bike rack or drinking fountain? I think it is the latter but maybe you could clarify, “Electric vehicle chargers that are intended to be used while the car is parked in a parking space are not a Quick Vehicle Servicing use or any other use category but are regulated like parking spaces by 33.266” or something?

Testimony is presented without formatting.



# Andrew Lindstrom

**#331879 | May 23, 2022**

Testimony to on the **EV Ready Code Project, Discussion Draft**

Good afternoon, as a renter and Portlander I think that this is a generally good idea. I like that it makes parking lots more expensive for developers to build, since that will act as a general incentive for more dense land-use with less valuable city space dedicated to parking cars. I also like that it will encourage people to have an EV rather than a gas car, since emissions and noise from gas cars is definitely still a big concern - especially for us renters who bear a disproportionate burden of road noise and pollution due to being generally confined to higher traffic roads. In Portland, renters in apartment buildings are roughly 3x more likely to live on a major road than folks who live in detached single family homes.

Testimony is presented without formatting.

# Daniel Reimer

**#331878 | May 23, 2022**

Testimony to on the **EV Ready Code Project, Discussion Draft**

Electric vehicles should include thought about micro mobility transportation solutions such as electric bikes. Most are charged with simple 110v wall outlets, bicycle parking should have needed outlets in order to charge.

Testimony is presented without formatting.

# James Marquard

**#331876 | May 22, 2022**

Testimony to on the **EV Ready Code Project, Discussion Draft**

As an early advocate and adopter of EV's, it has been a beneficial path for my wife and I to drive electric in Portland, and beyond. We would encourage the City to do what is can as fast as it can to help speed the transition away from fossil fuels and towards further electrification of our transportation network. Changing building codes to mandate - in most cases - the number of home/retail/businesses that have charging in place is plainly needed. The cost of installing such charging points during construction is relatively inexpensive. So... let's do it. Thank you for taking the time to include this testimony.

Testimony is presented without formatting.

# Robert Hayden

**#331875 | May 21, 2022**

## Testimony to on the **EV Ready Code Project, Discussion Draft**

Enabling EV charging for drivers living in multi-residential buildings is a critically important element in successfully transitioning to high levels of electric vehicle ownership, and in Portland's ability to move towards compliance with its climate protection goals. By far, the lowest cost scenario for installing EV charging infrastructure for spaces within parking lots is at the time of construction. The city's draft EV Code would expand the state's new-construction requirement of 20% of residents' parking spaces being EV-ready to 50% -- defined as electrical conduit being installed to at least half the parking spaces during construction and the building having sufficient electrical capacity to support Level 2 charging in that many spaces when charging units are installed in the future. I fully support the city's proposed expansion of the state requirements, and I further encourage the city to go farther with its expansion. Specifically, the number of parking spaces with conduit could easily be expanded to 100%, even while maintaining the electrical capacity requirement at 50%. This is because power management systems are now readily available for EV charging power-sharing, thus allowing for full coverage of charging opportunities without increasing the building's power requirements. The city's economic analysis shows that the incremental cost for additional shared EV charging readiness (in the low- to mid- hundreds of dollars) is a fraction of the incremental cost for individual charging readiness. Predicating the expansion to 100% of spaces upon the use of shared charging would thus maximize the cost effectiveness of the cost-savings effect that is attained by installing the conduit during construction rather than later retrofits. Another important consideration of making all new parking spaces EV-ready at the time of construction is that it avoids confusion, difficulty or even conflict between residents and building managers in determining who gets to use the EV-ready spaces. In many buildings, the parking spaces are assigned, or even deeded, and rearranging assignments as more residents obtain EVs can be problematic. This can be a barrier to EV ownership, and it can be addressed by providing access to all from the beginning. Respectfully submitted, Robert Hayden  
Portland Resident, and Retired Senior Policy Manager for Clean Transportation and Electric Vehicles, San Francisco Department of Environment

Testimony is presented without formatting.

# Fergus Caldicott

**#331847 | May 18, 2022**

## Testimony to on the **EV Ready Code Project, Discussion Draft**

Firstly, I am delighted to see the city making progress regarding EV code development. I have been following this discussion since The Portland Way was issued in 2010, and it feels like some significant progress on that vision is now being made. The one omission I would like to bring to light, which covers a need for myself and most of the people in my neighborhood, is to support permitting private installations of EV chargers in the public right-of-way. Living in the west hills of Portland, most houses do not have garages and are limited to on-street parking. Also, the housing density is such that it is probably cost-prohibitive for public providers of EV infrastructure to find a compelling business case for installation, and thus we are unlikely to be provided with any EV charging solutions. The irony is that my neighbors and I would be willing to invest in the infrastructure ourselves according to standards provided by the city if it were permissible under city code, but alas it seems as though our case has not been considered. It is worth noting that the need I highlight is easily illustrated by the many non-permitted installations one can see while strolling around the neighborhood, so it would be welcomed if the code considerations could be expanded to encompass this need. Thanks so much for your time and efforts on this. Fergus Caldicott

Testimony is presented without formatting.

# Jennifer Rodriguez

**#331845 | May 18, 2022**

Testimony to on the **EV Ready Code Project, Discussion Draft**

33.266.130.H - regarding screening of EV chargers - the feedback from the groups at the beginning of the document listed a specific concern about finding spaces, which means publicly available or shared EV chargers should be readily visible from the street (since they will be looking for EV chargers from their vehicle in motion) and illuminated at night for visibility and safety concerns. Transformers and the accompanying equipment should be screened. Chargers themselves should be screened from adjacent properties, and only screened from the PROW if the charger is a dedicated/private one.

Testimony is presented without formatting.