

Noelani Derrickson

#332043 | September 16, 2022

Testimony to the **Planning and Sustainability Commission** on the **EV Ready Code Project, Proposed Draft**

Comments from Tesla attached.

Testimony is presented without formatting.

September 16, 2022

Portland Planning and Sustainability Commission
Attn: Ingrid Fish, Marty Stockton
1900 SW 4th Ave
Portland, OR 97201
VIA EMAIL:
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Marty.Stockton@portlandoregon.gov

Dear Planning and Sustainability Commission:

Tesla appreciates the opportunity to provide comments on Portland's Electric Vehicle (EV) Code Project Proposed Draft. Tesla strongly supports most of the proposed code changes which establish EV readiness requirements for parking spaces in new buildings and reduce EV charging permitting and zoning restrictions. However, we are concerned with the proposed restriction 33.266.130.H. which prevents EV charging stations and associated equipment from being located in existing landscaping, as it unnecessarily constrains EV charging station build-out in the city of Portland. These comments detail the challenge of this proposed code change and recommend revisions.

As detailed in the Proposed Draft, EV charging stations, specifically direct current fast charging (DCFC) stations, typically require associated electrical equipment, such as electrical cabinets, switchgear, 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. Removing minimum parking count requirements throughout the city would alleviate the concern for property owners of triggering additional review or a variance process if the proposed EV charging station reduces parking count below the required minimum. Even with this change, commercial properties, where most DCFC are located, prefer locating equipment in landscaping to keep parking spaces available for customers.

The Proposed Draft restricts EV charging equipment from locating in perimeter landscaping, making it more challenging to convince property owners to install DCFC if additional parking spots are lost. Tesla strongly recommends reevaluation of the proposed restriction in 33.266.230.H. (Page 43) to allow EV charging station equipment in existing landscaping. Additional mitigation obligations could be considered to allow equipment to be located in existing landscaping, such as relocating landscaping lost, vertical landscaping, bike parking, or other opportunities to meet city sustainability goals. We recommend consideration of our proposed code revisions found in the attached Appendix.

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

Sincerely,

Noelani Derrickson
Sr. Policy and Business Development Advisor
Tesla

Appendix

Language to be added is underlined

Language to be deleted is shown in ~~strikethrough~~

33.266.130.H. Electric vehicle chargers and equipment in parking areas. Electric vehicle chargers and accessory equipment may be located within surface and structured parking areas, subject to the following:

1. The chargers and equipment can be placed in areas adjacent to parking spaces, ~~but are not allowed~~ and within required perimeter landscaping areas.
2. The chargers may project into a portion of a parking space. However, the chargers cannot project more than a 2-foot square into the minimum required parking dimension.
3. Electrical equipment, generators or transformers associated with EV chargers must be screened from the street and adjacent residential zones by walls, fences, or vegetation. Screening must comply with at least the L2 or F2 standards of Chapter 33.248, Landscaping and Screening, and be tall enough to screen the equipment.

4. The chargers and equipment placed in perimeter landscaping may be required to propose a mitigation plan for administrative review for perimeter landscaping lost.

Michelle Schulz

#332042 | September 16, 2022

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Thank you for hearing this testimony. As a member of the BOMA Board, we would like to express some of the concerns that our BOMA membership have related to future impacts of this proposed draft. Based on testimony provided in the hearing on Tuesday of this week, we understand that there will be an amendment added that will impact our commercial building owners. Our understanding of the amendment suggested during the hearing was that there would be additional requirements for commercial office buildings to provide charging capabilities for e-bikes in short-term parking areas. Our concerns with this amendment include: 1 - Most short-term bike parking are provided at the building entry or ROW areas, and are not in secured areas or monitored areas. And may times, not in areas where a power source is in the general vicinity. 2 - Most, if not all, e-bike riders are not going to leave their bike and charger sitting out on the street – especially at a time when our streets are unsafe and crime is at an all time high. 3 - We are also seeing our buildings broken into so that transients and homeless campers can run power extension cords from buildings or exterior outlets, causing unsafe conditions around our buildings and in the public right of way. Many of our building owners have had to shut off power to their exterior outlets to try to stop these issues from happening. Additional outlets at the short-term bike parking areas would only make that issue worse. 4 - Most short-term bike riders are not looking to connect to power while they are running into a building for a 30-60 minute meeting/appointment...”short term”. 5 - Our building owners struggle already with getting PBOT approvals on exterior outlets in the ROW for planting/tree areas, this is only add to that struggle and further expand on permit process timelines for PWP permitting efforts. We will be forced to address how to get power out to the street, where the increased power is coming from, determine if new/added infrastructure is going to have to be provided - and then get approval for new infrastructure/equipment in the ROW that is approvable by with PBOT and PGE. 6 - We would also like to understand what conversations have been conducted with Pacific Power and PGE on this. Has there been studies done to assess the availability of this added power? Is there going to be enough power to support all of this? We have been running into issues with other jurisdictions PUD’s that are telling us there isn’t sufficient power for EV vehicular charging to support our projects. We want to be sure the infrastructure is there to support this, or before making this code, that the infrastructure systems have been put in place to get the power needed. Otherwise, our building owners are paying for this additional infrastructure that can’t be supported. Thank you for hearing and considering our testimony. We hope that the proposed amendment for adding power at short-term bicycle parking is not incorporated into the updated draft.

Testimony is presented without formatting.

Chris Smith

#332041 | September 16, 2022

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A few useful links eBike popularity and environmental impacts:

<https://www.calbike.org/e-bike-research-shows-environmental-and-economic-benefits/>

<https://www.bloomberg.com/news/articles/2022-01-21/u-s-e-bike-sales-outpaced-electric-cars-in-2021>

Testimony is presented without formatting.

Shawne Martinez

#332039 | September 13, 2022

Testimony to the Planning and Sustainability Commission on the EV Ready Code Project, Proposed Draft

Hello Commission members, My name is Shawne Martinez, I am a stay at home Dad that travels by e-cargo bike almost exclusively. We've had our electric box bike for 2.5 years and put over 12,000 car free miles on it! Range anxiety is always present when we are out riding. I am constantly on the hunt for public power outlets especially if they are near bike racks. Interestingly public power outlets are easily found in Washington County at many parks and libraries. Multnomah County is the opposite where most power outlets are locked or switched off. One reliable charging spot for us is at the bike racks at OMSI where we can lock our bike, plug in our charger and enjoy the science museum while we top-off our battery. Including power outlets near bike racks will help not only people on bikes but also e-scooters, one wheels, electric unicycles and other e-micromobility. Please consider adding requirements for conduit to be installed to outdoor and indoor bike racks for power outlets to charge e-micromobility. Thank you, Shawne Martinez

Testimony is presented without formatting.







Amanda Dalton

#332038 | September 13, 2022

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Regarding C-G “Electric vehicle chargers and equipment in parking areas” on pg. 43, we have concerns with prohibiting Electric Vehicle Supply Equipment from landscape areas. Most of our concerns have to do with existing sites that are looking to introduce EV Chargers. Specifically: -In some parking lots, these landscape islands are the only space between the parking and a structure and are necessary for the operation of an EV charger. -If the concern is about aesthetics, there can be solutions around screening (i.e. providing mechanical screening using landscape a natural green screen. -By prohibiting equipment in landscape areas, that may result in changes to the existing number of parking spaces of a site being reduced or removed. -This small prohibition would be another barrier to installing EVs in existing sites.

Testimony is presented without formatting.

Jason Henry

#332031 | August 17, 2022

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I propose allowing home owners/churches/synagogues be able to place a commercial level 2 charger in front of their property or in their parking lots. This would allow greater number of chargers and greater access in the community. Yes I realize this would require variances and possible rezoning changes. It's All Good Energy will offer only supply renewable energy using REC's and VPPA's. I believe this will increase the number and convenient neighborhood locations of charger. Rome is burning as they say, I believe community charging supplied by the many for the many is the future that people, communities, cities, and our future require.

Testimony is presented without formatting.

Michael Burdick

#332030 | August 17, 2022

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With transportation contributing so heavily to catastrophic climate change, building EV charging infrastructure should be among our top development priorities right now and for the next 5-10 years. Two provisions in 33.266.130.H., "Electric vehicle chargers and equipment in parking areas" inappropriately prioritize aesthetic concerns over fighting climate change. Aesthetics do matter, but for the next 5-10 years, aesthetics should be de-prioritized whenever aesthetic concerns could hamper the pace of EV charging infrastructure development. Specifically, the language in (1) disallowing chargers and equipment in perimeter landscaping areas, and in (3) requiring screening for electrical equipment, generators, and transformers, should be eliminated. These provisions would be reasonable several years from now once the city reaches a stage where we aren't suffering from critically inadequate EV charging infrastructure, and electrification of the transportation system is further along. However, if implemented now, they will hamper critical EV infrastructure development and increase the risk of catastrophic climate change. Respectfully submitted.

Testimony is presented without formatting.

Cory Pinckard

#332029 | August 11, 2022

Testimony to the Planning and Sustainability Commission on the EV Ready Code Project, Proposed Draft

Hello, Oregon owes a lot of its strengths to rail infrastructure, much of which unfortunately no longer even exists. The further we move away from the logical layout provided by streetcar grids and electric commuter interurban railroads the uglier and less livable the city and its suburbs become. An intelligent coastal city would take advantage of this limited time of people crowding in to install city assets that will benefit us for generations such as a rail route beneath the Willamette and railway going between Vancouver and us. It makes perfect sense to put railway stations on Marquam Hill and at our community colleges and zero sense not to. Electric cars also destroy the environment including releasing greenhouse gases through resource mining, manufacturing processes pollutants and ultimately going to the landfill in mass droves. The pollution they cause is simply unnecessary as is the amount of urban space squandered on parking and other paved over autocentric wastes. They also perpetuate urban sprawl, redlining, the food deserts that come from that invariably, along with cities that are not navigable as a pedestrian or bicyclist and are, in fact, inhospitable to humanity along with being horrendous towards animals. They add to traffic congestion. Commodification of societal needs and normalization of trying to substitute rampant consumerism where we need standardized, regulated and uniform public utilities doesn't work. Putting the financial burden of transportation inefficiently and directly on the individual citizen is simply not wise or fair and hasn't been the norm for even 80 years. We need to invest in commuter rail that's properly implemented as it typically is overseas. A commuter rail system is an engineering marvel while buses are just buses. The most reliable predictor of a neighborhood being impoverished is if it has no commuter rail connection. The American people are apathetic through decades of disenfranchisement and a lot of that marginalization (eg Robert Moses's racist urban renewal) is through divestment of public infrastructure, utilities and programs to help the American people. How many special places were destroyed fated to become mere parking lots? How many lives were wrecked as entire communities and cultural centers of minorities were wiped off the face of the world as though an atomic bomb had been dropped on it in order to force through highway robbery highways were pushed through the wreckage and rubble of razed annihilation that those same victims now in atomized diaspora had to then help subsidize which is often the case with the rapid onslaught and constantly rupturing outbreak of mediocre monstrosities being raised all over the place currently, looming gloomily over neighborhoods they've doomed as ugly tombstones in the spaces of what was demolished for them to be erected. We're past the point of car dominated transportation being anything better than a tragic hindrance or an outright travesty. Public works

materially improving life for the taxpaying citizenry will bolster civic pride. Transcontinental High Speed Rail should integrate seamlessly with commuter rail networks so it can evenly function as one cohesive system and this will convert flyover country back into a thriving heartland by functioning as an artery of commute and commerce which will reduce clustering on the coasts. Similarly, wholly integrated circuits of commuter rail blended with interurban routes, light rail lines, street car grids, subways, and even trolleys along with ferries functioning together as a comprehensive series of interwoven systems would prevent people from having to live on top of each other in city centers in order to have quick access to urban cores and downtown areas so this would stimulate our local economies and prevent gentrification from demolishing cherished heirlooms of our historicity, destroying our classic neighborhoods, shredding the fabric of our communities and toppling our civic landmarks and architectural heirlooms along with other social capital such as venerable culture generating venues. Numerous studies show that built environments of homogenously bleak and bland duplitecture dreck made from extremely toxic and highly flammable petrochemicals that profiteering developers push on us for their privatized gains to our public loss for the riches of themselves and corporate slumlords not only cause the unnecessary violence of homelessness by being financially inaccessible to most Americans, but also cause depression from creating such a devastatingly sterile, cold, unloving urban habitat that's too congested and overcrowded to work properly as a correctly engineered built environment. Our hostile downtowns are chock full of skyscrapers and high rises that are horrible for the climate and environment whether they're LEED certified or not. Our roadways are overcrowded and no amount of widening them and adding lanes will do anything to help it because it just leads to induced demand that inevitably grinds to a halt at snags and bottlenecks down the road. Shouldn't American cities be thriving centers of culture and character rather than austere and chintzy morasses of mediocrity? We absolutely can design the cities of our nation to reflect a future that embraces all life including humanity and we also must for America to have any sort of a bright future ahead of it. Right now we are mired in the destruction of our cities from the inward attacking plutocrat neocolonial oppressors who weaponize their clout of wealth against the nation for their own off-shore un-American gains of privileged, parasitic, private profits. This greed fueled anti-social exploitation is present day feudalism driving us into another gilded age. Tons of new brutalist "luxury living" housing units remain empty serving only as financial assets in investment portfolios of hedge fund and permanent capital cretins sheltering dubiously acquired wealth instead of as direly needed shelter for humans. We deserve a landscape we can be proud of and country should come first before corporate looting and exploitation. Legacies are important and live on forever. With space opened up in our cities we could rebuild beloved structures gone from economic and environmental disaster utilizing new technologies such as hempcrete and 3-D printing. We could create vertical agriculture farms etc. on spots currently now just serving as paved over squares and nothing more. With solutionary commuter rail infrastructure forming the framework of walkable environs Americans won't be shoe-horned into a physical atmosphere that forces bad health upon them. We can design our landscape to rid ourselves of the staggering amount of senseless and unnecessary deaths from car wrecks and struck pedestrians/cyclists. We can extend democracy into offering the taxpayer residents democratic say in

what their city consists of, how it looks and how it operates promoting civic engagement and participation. Respectfully, Cory Pinckard

Testimony is presented without formatting.

Jennifer Rodriguez

#332028 | August 11, 2022

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33.266.130.H.1 - "...cannot project more than a 2-foot square..." - Please clarify the language here. Is this 2 square feet? Is this a 2 foot by 2 foot projection?

Testimony is presented without formatting.