



City of Portland, Oregon
Bureau of Development Services
 FROM CONCEPT TO CONSTRUCTION

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MEMO

Date: September 13, 2022
To: Ingrid Fish
 Bureau of Planning and Sustainability
From: Kimberly Tallant, Land Use Services Division Manager
 Bureau of Development Services
Re: BDS Comments on EV Ready Code Project, August, 2022

Thank you for the opportunity to review and comment on the EV Ready Code Project. This project provides mechanisms to require electric vehicle (EV) charging with multi-dwelling development and can add clarity 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 and Tom Soppe at Thomas.Soppe@portlandoregon.gov on my staff.

Primary Areas of Concern

1. The term “Level 2” charger is used repeatedly but there is no definition which can cause confusion for applicants and planners.

Potential Implementation Issues

1. See item #1 above.

Detailed Comments

We offer the following additional detailed comments.

Item No.	Page	Code Section	Comment
1	25	33.110.245.D.3	Presumably, if someone were to install a Level 2 charger, they would want it to be located close to the parking area or driveway which raises the question of whether it is

Item No.	Page	Code Section	Comment
			necessary to regulate that the charger must be located within 5 feet of the parking area or driveway.
2	25 and many other pages	33.110.245.D.3 and many other sections	Should there be a definition of Level 2 charger? Having a definition or a reference to an industry standard to help planners guide applicants to and confirm that chargers meeting the Level 2 standard are installed is necessary. Or if the technology is changing rapidly and Level 2 may become obsolete, should the term be more general than "Level 2" and instead say something like "EV charging at a rate higher than 110-volts"?
3	43	33.266.130.H.1	What is the rationale for not allowing EV chargers to encroach into perimeter landscaping? Perhaps in locations where EV chargers are located F2 screening could be allowed to substitute for L2 or L3 landscaping. This would also improve visibility of the chargers. EV chargers in interior parking lot landscaping areas could also be allowed to reduce amounts of required landscaping.