



Capitol Consulting, LLC

February 1, 2022

Dear Chair Martin and Members of the Planning Commission:

I write you today on behalf of the Arizona Multihousing Association (AMA) regarding the proposed Electric Vehicle (EV) parking requirements to be presented to the Commission on February 2, 2022.

Under the proposed ordinance, all new multi-family developments would be required to, at a minimum, install EV "capable" parking spaces in fifteen percent of the proposed development's total parking spaces and, at a minimum, install EV "ready" parking spaces in ten percent of the proposed development's parking spaces.

The AMA is concerned that such a prescriptive requirement imposes an undue regulatory burden that does not consider or reflect current, or even future, market conditions. In a survey to multi-family operators, responses indicated that market penetration for EV, and more specifically renters requesting EV charging capabilities, remains low. According to the Arizona Department of Transportation, of the 7.4 million total vehicles registered in the state of Arizona, only 40,964 vehicles are EVs.¹

While the AMA supports EVs and the move towards this emerging technology, the AMA would request that the city refrain from adopting mandatory and prescriptive requirements that will force builders to install costly infrastructure components at a time when the technology continues to rapidly evolve. Improvements to batteries, rapid charging capabilities, solar charging stations and even solar charging cells imbedded into the vehicles themselves, could very well make these costly parking infrastructure requirements moot.

Moreover, multi-family operators are well positioned and highly incentivized to respond to market conditions. For example, if EV penetration in Tucson were to somehow double, triple, or quadruple overnight - and most importantly the demand for EV charging stations from renters emerged - owners would respond swiftly. This is no different than any other market change or demand which operators routinely address.

On the other hand, housing affordability has become an immediate concern for Tucson citizens. See:

- [Tucson affordable housing plan ignores typical residents, experts say | Arizona Daily Star](#)
- [No Refuge: Tucson's Homeless Crisis is Getting Worse | Tucson Weekly](#)
- [City of Tucson works to combat the affordable housing crisis with Landlord Incentive Program | KGUN9](#)

Adding new construction requirements, such as the proposed EV parking requirements, will only add to the overall cost of housing in Tucson and continue to exacerbate housing affordability concerns.

It is for these reasons that we request the Commission oppose the proposed EV multi-family parking requirements.

Should you have any questions, please do not hesitate to reach out at any time at bbg@theriver.com.

Respectfully,


Ben Buehler-Garcia

RONIN Business Services – On behalf of the AZ Multihousing Association

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¹ <https://azdot.gov/fast-facts>