

TESTIMONY REGARDING SB 146
being heard by the Maryland Senate Judicial Proceedings Committee
on Tuesday, January 18, 2022 at 1:00 PM

Dear Chair Smith, Vice Chair Waldstreicher and Members of the Committee:

Thank you for the opportunity to provide input on SB146, Vehicle Laws - Plug-In Electric Drive Vehicles - Reserved Parking Spaces, which will make it easier for commercial and multi-unit residential parking lots to add charging infrastructure for electric vehicles by ensuring that parking spaces with chargers are counted as part of the overall number of parking spaces for compliance with zoning and parking laws.

Tesla's mission is to accelerate the world's transition to sustainable energy through the deployment of electric vehicles (EV) and energy storage solutions and solar energy systems. To date, Tesla has delivered more than two million EVs globally. This experience gives us unique insight into what it takes to deploy electric vehicles at volume and which policy mechanisms are most effective in furthering adoption.

Maryland has set an ambitious goal of 300,000 zero emission vehicles (ZEV) on the road by 2025. To meet this goal, it is important for the state to develop policies that encourage ZEV adoption, including those that make it easier to deploy charging equipment in commercial and residential parking lots. SB 146 is a sensible approach to make sure that developers and owners are not required to add additional parking spaces to meet zoning or parking laws when they install chargers for electric vehicles.

We suggest one change to section (F) of the bill indicated below. Removing this section will preserve the intent of the bill – to count charging spaces in the overall parking count – while removing language that could cause some unforeseen regulatory complications given federal and state accessibility rules.

~~(F) A PLUG-IN ELECTRIC DRIVE VEHICLE CHARGING SPACE SHALL BE COUNTED AS PART OF THE OVERALL NUMBER OF PARKING SPACES IN A PARKING LOT FOR THE PURPOSE OF COMPLYING WITH ANY ZONING OR PARKING LAWS INTENDED TO MEET REQUIREMENTS FOR COMMERCIAL AND INDUSTRIAL USES UNDER THE AMERICANS WITH DISABILITIES ACT.~~

In addition, while not before this committee, we support an additional amendment to the cross-filed bill in the House, HB157. That bill includes a signage requirement for charging spaces funded, in whole or in part, by state funds or funds collected from utility ratepayers. Tesla is not opposed to the state, or utilities, putting requirements on their funding programs for charging infrastructure, but those requirements should be put into the terms and conditions for participation in the program, not into state law. As written, the language may be misinterpreted to include virtually any public charger in the state. There are commercial properties who would like to install charging infrastructure but would not want to have a sign as required under HB157. For example, an establishment with limited spaces for customer parking may not be willing to limit its parking to EV customers only. The approach in SB146, to outline what should be on a sign if a property owner chooses to install one, without requiring their installation, is a better approach to ensuring that potential site hosts are not dissuaded from installing EV chargers on their property.

Thank you for the opportunity to provide this testimony.

Zachary Kahn
Senior Policy Advisor, Northeast