



February 13, 2023

The Honorable Brian J. Feldman, Chair  
Education, Energy, and the Environment Committee  
Miller Senate Office Building, 2 West  
Annapolis, MD 21401

**Support w Amendment: SB 477 – Residential Construction or Significant Renovation – Electric Vehicle Charging**

Dear, Chair Feldman and Committee Members:

The NAIOP Maryland Chapters represent 700 companies involved in development and ownership of commercial, mixed-use, multifamily, and light industrial real estate, including some of the largest property owners in the state. NAIOP's membership is comprised of a mix of local firms and publicly traded real estate investment trusts that are invested in the future of Maryland but also have experience in national and international markets.

NAIOP supports adoption of pragmatic strategies and technically sound, least-cost approaches to the reduction of greenhouse gas emissions on schedules and using methods that minimize economic disruption and result in a managed, orderly energy transition for building owners and occupants.

The building, fire and electric codes adopted by the state contain provisions to ensure the safe design and construction of electric vehicle infrastructure. Senate Bill 477 proposes changes to the Maryland Building Performance Standards that would specify when and how many residential parking spaces must be fully equipped to charge electric vehicles or made ready to easily install charging equipment in the future. The legislation builds upon existing installation requirements for new single family and townhouse construction and, for the first time, applies requirements to residential renovations and to multifamily buildings.

Maryland's climate goals and the state's adoption of California's emissions standards for cars and light trucks necessitate installation of electric vehicle charging infrastructure at an accelerated rate. Removing the barriers to electric vehicle infrastructure installation in multi-family residential buildings is a key element to meeting these requirements. Beyond that, the bill takes a pragmatic and essential step forward by proposing the retrofitting of existing single family and townhouses. The importance of this issue makes NAIOP supportive of the goals of Senate Bill 477, but we are unable to support the bill as introduced.

NAIOP recommends the committee work to clarify and refine the bill by:

- Adopting a definition of significant renovation that aligns with the current building code.
- Refining and clarifying the definition of multi-family to align with the current building code.
- Clarify how EV-ready affects electric load calculations and building level power requirements.

- Ensure the caps on state grant and rebate programs align with multifamily eligibility.
- Authorize local code officials to modify the requirements based on cost or feasibility.
- Optimize the ratio of EV charging to EV-ready spaces to limit instances of unused charging equipment.
- Include language to resolve potential conflicts with fire electric and accessibility codes.
- Adjust carbon accounting methodology to ensure transportation sector emissions are not shifted to building's sector
- Ensure that dedicated EV charging spaces are counted toward parking minimums in local zoning.
- Limit or preempt inconsistent local requirements related to EV infrastructure.

Thank you for the opportunity to offer comments and suggestions on SB 477. NAIOP appreciates your consideration of the industry's point of view.

Sincerely,



Tom Ballentine, Vice President for Policy  
NAIOP Maryland Chapters -*The Association for Commercial Real Estate*

cc: Education, Energy and the Environment Committee Members  
Nick Manis – Manis, Canning Assoc.