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March 1, 2024

TO: Members of the Education, Energy, and the Environment Committee  
FROM: Janet Abrahams, HABC President & CEO   
RE: Senate Bill 695 - Building Code - Construction and Significant Renovation of Housing Units - Electric Vehicle Parking Spaces

POSITION: Letter of Information

Members of the Education, Energy, and the Environment Committee, please be advised that the Housing Authority of Baltimore City (HABC) wishes to submit a Letter of Information to request an exemption on properties owned and operated by public housing authorities.

HB 889 - Building Code - Construction and Significant Renovation of Housing Units - Electric Vehicle Parking Spaces requires the construction of new multifamily residential buildings with separate garages, carports, or driveways for each residential unit to include parking spaces for electric vehicle charging. The bill also states that if the construction or renovation of housing units includes significant renovation that includes electrical panel upgrades that increase the panel's capacity or parking upgrades that involve repaving or trenching in or around parking spaces, the following apply:

- For every 25 residential units, at least one common use EVSE installed parking space.
- For a development application or building permit application made on or after October 1, 2024, at least 10% of the parking spaces;
- For a development application or building permit application made on or after January 1, 2030, at least 20% of the parking spaces; and
- For a development application or building permit application made on or after January 1, 2035, at least 30% of the parking spaces.

HABC is the country's 5th largest public housing authority and Baltimore City's largest provider of affordable housing opportunities. HABC is federally funded and regulated by the U.S. Department of Housing and Urban Development (HUD). HABC serves nearly 44,000 of Baltimore City's low to extremely low-income individuals through its Public Housing and Housing Choice Voucher programs. The public housing inventory currently consists of almost 6,000 units located at various developments and scattered sites throughout the city.

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HABC is working to transform its public housing developments into thriving mixed-income communities where residents have opportunities for economic mobility. Three of our current major redevelopment initiatives include the Perkins Somerset Old town (PSO) Transformation Plan, Transform Poe and the O'Donnell Heights revitalization plan.

The PSO Transformation Plan includes the demolition and replacement of 629 public housing units as well as the construction of 424 low-income units serving households with an average of 60% AMI, and 307 unrestricted market-rate units spread across the Somerset and Perkins sites.

The O'Donnell Heights revitalization plan includes the construction of approximately 925 mixed income units, including mostly row homes, two-story walk-up flats, and a low-rise apartment building. Under the Transform Poe plan, 288 distressed public housing units at Poe Homes will be demolished and replaced as part of a new mixed-income community that will support existing and future residents.

All three of HABC's current major redevelopment initiatives are in progress and have already been designed by architects. If passed, this legislation would add to both re-design and construction costs, which would result in a delay of upcoming financial closings and the creation of new affordable units for the families we serve. As written, HB 889 will be troublesome for our projects with funding gaps, causing additional costs to projects struggling to find funds.

As HABC performs renovations and continues to redevelop our remaining public housing sites, installation of EV stations would require multiple spaces due to the size of the units, which would impact existing parking spaces on our lots, and further reduce the already limited parking. In addition, as property owners, public housing authorities would be responsible for the cost of providing the electricity for the new spaces, as electric charging stations are considered an amenity that housing authorities are prohibited from charging residents for under federal regulation.

HABC respectfully requests the consideration of the information stated above for purposes of this legislation.

Respectfully submitted:

Janet Abrahams, HABC President & CEO