



House Bill 889

Committee: Environment and Transportation Committee

Bill: House Bill 889 Building Code – Construction and Significant Renovation of Housing Units – Electric Vehicle Parking Spots

Date: February 21, 2024

Position: Unfavorable

The Maryland Multi-Housing Association (MMHA) is a professional trade association established in 1996, whose members house more than 538,000 residents of the State of Maryland. MMHA’s membership consists of owners and managers of more than 210,000 rental housing homes in over 958 apartment communities and more than 250 associate member companies who supply goods and services to the multi-housing industry.

House Bill 889 (“HB 889”) requires the construction of new multifamily residential buildings with separate garages, carports, or driveways for each residential unit to include certain parking for electric vehicle charging. In addition, this bill requires housing units that are undergoing significant renovations with separate garages, carports, or driveways for each residential unit to include certain parking spaces for electric vehicle recharging. It should be noted that as part of the passage of Chapter 582 Residential Construction – Electric Vehicle Charging legislation from the 2023 Session¹, a study was mandated to be conducted by MEA with the goal of “*studying the costs, barriers, and impacts related to requiring both new and existing multifamily residential buildings to include EVSE-installed or EV-ready parking spaces.*”. This MEA report², published last month, is a key component of this legislation.

MMHA would like to respectfully request an unfavorable report on House Bill 889. While MMHA appreciates the intent of this legislation, there are significant areas of concern that need to be addressed. To begin, MMHA has strong concerns under what is defined in the legislation as “SIGNIFICANT RENOVATION” that would trigger compliance measures for existing multi-family housing units. The definition in the legislation is as follows:

“SIGNIFICANT RENOVATION MEANS: (I) A RENOVATION TO A HOUSING UNIT THAT INCLUDES ELECTRICAL PANEL UPGRADES THAT INCREASE THE CAPACITY OF THE PANEL; OR (II) PARKING UPGRADES THAT INVOLVE REPAVING OR TRENCHING IN OR AROUND PARKING SPACES”

MMHA takes issue with both (I) and (II) portions of the cited definition. Regarding (I), as this committee is aware, many of our property owners will need a new electric panel upgrade as part of the new compliance standards required under the enacted Climate Solution Now Act of 2022 (CSN)³. This provision will result in beleaguered property owners, who are renovating to comply with CSN, to now be bombarded with additional costs that come as a result from this bill. As the

¹MD General Assembly. Chapter 582 Residential Construction – Electric Vehicle Charging. Reg. Session. 2023. [2023 Regular Session - House Bill 830 Chapter \(maryland.gov\)](#)

²Maryland Energy Administration Multifamily Residential EV Study – Jan. 2024. [Multifamily Residential EV Study.pdf \(maryland.gov\)](#)

³MD General Assembly. Chapter 38 Climate Solutions Now Act of 2022. Reg. Session. 2022. [2022 Regular Session - Senate Bill 528 Chapter \(maryland.gov\)](#)



report cited on page 26¹, MEA detailed a graph with actual estimated installation costs for retrofitting various existing multi-family housing units with electric vehicle supply equipment (EVSE) showing the following:

Table 7: Summary of EVSE Cost Estimates, by Multifamily Unit Type

Type	Quantity	Labor Direct Cost	Material Cost	Soft Cost	Total Installed Cost
Townhomes - L2 Charging Stations	1	\$9,669	\$7,795	\$8,544	\$26,008
Low Rise - L2 Charging Stations	1	\$10,680	\$18,995	\$14,302	\$43,977
High Rise - L2 Charging Stations	1	\$12,282	\$19,523	\$15,271	\$47,076
Structured Parking - L2 Charging Stations	1	\$12,282	\$19,523	\$15,271	\$47,076

2

This legislation offers no financial remedy to offset these cited costs associated with retrofitting existing multi-housing units. Without any new financial remedy offered to offset the costs, this is simply too much to ask of our members to bear.

Regarding (II), it is unreasonable to expect that a landlord, who has decided to simply repave a parking lot for the benefit of their tenants residing in a building, should now be expected to comply and install the charging stations as the bill as outlined. While trenching involves more significant groundwork, it would be inappropriate to deem “REPAVING” of a parking lot to be “SIGNIFICANT RENOVATION.” As this definition stands, this will only dissuade landlords from maintaining the parking lots for their tenants and trip up other landlords into complying with the installation of the charging stations.

In addition, this bill factors in no consideration for economic/market factors when requiring multi-family residential buildings to fall into compliance. The cost of purchasing and owning an electric vehicle in Maryland remains prohibitively expensive for many of our low income residents who reside in affordable multi-family housing units. For property owners of these multi-family housing units, it seems unreasonable to expect that they should burden this new expense with little reason to expect tenants will utilize these charging stations. By the admission of the key findings cited on page six of MEA’s report, *“there is a proportionate distribution of EVSE infrastructure to the population levels in [environmental justice] and low-income*

¹Maryland Energy Administration Multifamily Residential EV Study – Jan. 2024. [Multifamily Residential EV Study.pdf \(maryland.gov\)](#)

²Readers note: these estimated costs only cited installation costs and do not account for maintenance of the L2 charging stations.



communities.” If there is already a proportional distribution of EVSE in low-income communities, why would a mandate be necessary here at the expense of property owners?

Without significant rework of the “SIGNIFICANT RENOVATION” definition, a realistic consideration for economic factors in the legislation, and a new financial remedy to offset the increasing and compounding cost of compliance to our property owners, **MMHA must respectfully request an unfavorable report to HB889.**

Please contact Matthew Pipkin, Jr. at (443) 995-4342 or mpipkin@mmhaonline.org with any questions.