



To: Chair Helm, Members of the House Committee on Energy and Environment

From: Susan Steward, Executive Director  
Building Owners & Managers Association of Oregon

Date: April 2, 2019

Re: Please Oppose HB 3141 as Currently Drafted

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The Building Owners and Managers Association (BOMA) Oregon represents over 54 million square feet of commercial real estate in Oregon and Southwest Washington. As the leading commercial real estate association in Oregon, BOMA represents one of the largest industries in Oregon - Commercial Real Estate.

BOMA appreciates the merit of the bill and supports the increasing use of electrical vehicles. We respectfully request that you consider all of the implications of HB 3141, and if the bill moves, consider additional language to ensure the implications below are better defined.

The bill requires new building owners to develop ten percent of their parking spots for charging stations (applying to building permits for new construction issued in 2022). However, there is no provision suggesting that the jurisdictions should expand allowed parking if an owner desires to compensate for the spaces lost to charging stations by adding them as additional spaces rather than reduce to spaces available. The bill does not consider:

- Issues of revenue/income/return on investment.
- New building requirements are always a forerunner to similar existing building requirements.

To break down the cost of the 10% requirement, currently, a downtown Portland high-rise generally has a 0.8/1000 parking ratio. The average commercial building size today is 180,000 square feet, which would require 144 stalls (10% is 14 spaces total for electric vehicles).

In a suburban area, the average parking ratio is 4/1,000. The average building size is 40,000 square feet, but for simplicity we will use the same square footage of 180,000 square feet or 720 stalls or 72 electric vehicle spaces. Larger projects like the Nike campus or Intel, which have 1,000s of stalls would be required to have 100s of electric vehicle charging stations.

Each electrical vehicle charging station, not including all of the infrastructure costs, in today's dollars is about \$7,000. Therefore, the cost implementing HB 3141 would range between \$100,000 (downtown) to over \$500,000 to comply with the 10% requirement.

Further, the bill directs the director of the Department of Consumer and Business Services to adopt changes to the state building code that implements this change. Aside from the ten percent of space requirement there is no discussion of:

- What the location requirements will be for these spaces;
- How much can an owner charge for the power consumption at the spaces;
- And, there are no restrictions on the code changes.

BOMA believes the cost burden should not be solely born by the developer and there must be an offset or way to pay for these systems. At this point in time, it is difficult to offset this additional cost with future income from the chargers. Again, we understand that this is a matter of public good, but we ask that you consider all of the implications and find a more reasonable path forward to a greener future.

Thank you for your time and consideration. Please do not hesitate to contact BOMA for additional information.