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**Subject:** WE HBA Letter - City of Hamilton 100% EV Requirements

Good morning,

Please find attached a submission in response to Item 6.5 Planning Committee Report 24-003, February 23, 2024 on the Council Agenda for tomorrow. **We wish to re-iterate WE HBA's support for the vast majority of the zoning and parking changes approved by Planning Committee last week.** We have technical feasibility concerns about electrical grid capacity in the City's move to 100% EV Requirements. We look forward to resolving these issues through continued discussions with Council, Staff, and Alectra on how the industry can work together to implement Council's vision on this matter.

Thank you, and I am happy to answer questions you may have on this.

Michelle  
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5.16 (e)

February 27, 2024

TO: Mayor and Members of Council

**WE HBA Letter: Hamilton Parking Standards – EV Readiness**

WE HBA is supportive of the City’s initiatives to update its Parking Standards through eliminations in the most urban and transit-supportive areas of the City, and reductions city-wide. We believe that parking minimum reform will help the City meet its sustainability goals and improve housing supply and affordability. WE HBA is also supportive of the City’s climate goals and we are not opposed to the City’s movement towards electric vehicles.

**With that said, the rapid move to a 100% requirement for all residential parking spaces to be Electric Vehicle Parking is not feasible to implement due to servicing capacity constraints on Hamilton’s electrical grid.** Builders already face challenges meeting current market demand for electric vehicle charging infrastructure at around 15-25% of all parking stalls. WE HBA understands from City staff that the intent of the by-law is to require EV Ready rough-ins (conduit only) to enable future electrical hookups with ease. We are requesting this be made explicitly clear in both the language of the by-law and the definitions. As currently worded, there are three conflicting definitions with the EV requirement:

Staff Report	By-law	Definitions
“a parking stall that has rough-in conduits, and associated power supply to support Electric Vehicle charging infrastructure”.	100% requirement for all residential parking spaces to be Electric Vehicle Parking	Shall mean a Parking Space equipped with electric vehicle charging equipment which provides, or which is capable of providing Level 2, or greater, electric vehicle charging in accordance with the SAE International J1772 standard, as amended.”

WE HBA is requesting the City amend the by-law definition of “Parking Space, Electric Vehicle” to:

“Shall mean a Parking Space equipped with ~~electric vehicle charging equipment which provides, or conduit rough-ins for future electric vehicle charging~~ which is capable of providing Level 2, ~~or greater, or equivalent capabilities (such as electric vehicle charging in accordance with~~ the SAE International J1772 standard), as amended.”

Alternatively, we request Council defer the adoption of a 100% EV Requirement and provide direction for staff to work with the industry and Alectra in advance of bringing this requirement into the City’s zoning by-law. We’d like to propose an EV Ready Sub-committee (WE HBA, City, Alectra, HydroOne, and OPG) to help us all collectively navigate electrification. The proposed EV requirement being adopted now came as a surprise as WE HBA had been involved in a separate discussion on EV Requirements through a different consultation on Green Building Standards. WE HBA is hopeful that through further discussion between the City of Hamilton, Alectra, and the development industry, we can properly implement the City’s Electric Vehicle policy intentions.

Sincerely,

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End Home Builders’ Association

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