



July 22, 2020

Mayor and Council  
City of Victoria  
One Centennial Square  
Victoria, BC V8W 1P6

Re: EV Ready Zoning Bylaw

Dear Mayor and Council,

The Urban Development Institute (UDI) Capital Region is in full support of the transition to sustainable transportation options, including electric vehicles. We recognize this important shift as society works to combat climate change and move towards a greener economy. We wish that we were writing a letter of support, however due to Council's direction and the manner in which this process has unfolded we instead write to express our concern for the unintended consequences of the proposed amendments to the Zoning Regulation Bylaw and Zoning Bylaw 2018, which would establish electric vehicle charging design standards.

Initial engagement on the topic of EV charging readiness took place in 2018, and as outlined in the Committee of the Whole report dated June 4, 2020, Council directed staff to prepare a bylaw without additional public engagement, or without direct study of the financial impacts specific to the Victoria marketplace. Rather, staff are relying upon a study done in Richmond, which has a vastly different context in terms of transportation infrastructure, growth expectations and even socio-economic conditions.

Had further engagement with the development industry taken place, our concerns would have been raised earlier and we could have worked directly with BC Hydro to study and review Victoria's specific and unique traits, which directly impact the costs associated with this change. The increase in the electrical load based on the proposed requirements that 100% of stalls will force projects to increase their electrical infrastructure, including triggering sub-station requirements and / or more on-site transformers, as we have to assume that in the future 100% of the stalls could be seeking the maximum load all at one time. This in turn will trigger unnecessary infrastructure upgrades that go against the essence of affordability and sustainability.

Further, if BC Hydro has not been properly consulted on Victoria's proposal, there is a real risk, they may not have the supply of power sufficient to allow all projects to meet these requirements going forward. This could in turn slow the delivery of housing and other forms of space to serve the growing needs of the community.

Again, while we support the shift to more sustainable transportation models, a 100% installation requirement appears to be misaligned with the regions housing affordability strategy, as this change will add significant costs for



installation, management and long-term maintenance of the additional equipment required. Ten percent of cars sold in BC are electric cars and based on some figures gathered from the development community only 10 to 20% of buyers in multi-residential buildings are requesting electric charging stations. Installation of a single stall costs thousands of dollars which is added to the cost of the housing for the end renter / purchaser. This additional cost does not help the region's acute housing affordability crisis. Not to mention that EV's are a premium product that are unaffordable for most vehicle owners.

As such, UDI suggests a phased in approach over 5 to 10 years, which could be informed by market feedback and the adoption of electric vehicles across the general public. The phasing in of the percentage of stalls required will also allow the industry to adopt more cost effective solutions as the technology improves and becomes more commercially available and affordable.

As staff outlined in their report, many other municipalities have implemented similar programs to mandate EV requirements. This should provide the City of Victoria the opportunity to research and learn from these municipalities on the success or lessons learned from these initiatives. This was not discussed in the staff report.

UDI and the development industry believe that preparing for the future is critical, but proper consultation and implementation is required. We feel strongly that further study is required in the municipalities that have implemented similar policies to determine their effectiveness and efficiency, their impact on the cost of housing, and the supply of rental and market housing.

UDI welcomes the opportunity for further engagement with staff to determine the appropriate level of design standards that will accommodate electric vehicle charging while including the biggest factor in this entire discussion, BC Hydro.

Kind Regards,

A handwritten signature in dark ink, appearing to read 'Kathy Whitcher', followed by a long horizontal line.

Kathy Whitcher – Executive Director  
(on behalf of the UDI Capital Region Board of Directors)

*CC: Karen Hoese and Robyn Webb*