



SOUTHWEST ENERGY EFFICIENCY PROJECT

Saving Money and Protecting the Environment Through More Efficient Energy Use

March 1st, 2022

Ms. Lexy Wellott, Chair
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Adam Lucia, Member
Ms. Shannon McBride-Olson, Member
Chris Ortiz Y Pino, Member
Mr. Nicholas Pafford, Member
Patricia Schwartz, Member
Mr. Jay Young, Member

Dear Planning Commission Board Members,

Re: Agenda Item #3, “Commercial Parking Amendments UDC Text Amendment (C8-20-03)”

The Southwest Energy Efficiency Project (SWEEP) appreciates the opportunity to provide these comments to support the City of Tucson's efforts to develop an Electric Vehicle Ready building code in the Unified Development Code (UDC) related to commercial and multi-family parking. SWEEP believes this action will enable the growth of electric vehicles (EVs) while ensuring the charging process is safe and accessible in all building types.

Increased use of EVs will spur economic development and improve air quality—benefits that all Tucson residents gain. To realize these benefits, the City of Tucson must invest in EV infrastructure to make EV charging readily available for everyone, including those who live in historically disadvantaged communities. EVs have also emerged as a key climate strategy to reduce greenhouse gas (GHG) emissions from the transportation sector, which is one of the largest sources of carbon pollution in Arizona.¹

Interest in EVs has grown alongside greater model availability and expanded vehicle range, and there are now well over [1.8 million EVs](#) on the road. Just last year alone, sales of new light-duty plug-in electric vehicles, including all-electric vehicles (EVs) and plug-in hybrid electric vehicles (PHEVs), [nearly doubled](#) from 308,000 in 2020 to 608,000 in 2021. In Arizona, the EV market share is more than 4.3%, making Arizona 12th in the nation for EV growth. [Over 40 municipalities](#) around the country have already adopted EV infrastructure requirements for new residential and commercial buildings including Atlanta, Seattle, Denver, Boston, Fort Collins, New York, Sedona, Flagstaff, Honolulu, and Chicago. By adopting EV requirements in the UDC, the City of Tucson will provide standards that will give builders, architects, and others in the industry much-needed guidance and clarity on the technical requirements for EV charging infrastructure.

¹ U.S. Energy Information Administration, Table 4. State Energy-Related Carbon Dioxide Emissions by Sector, <https://www.eia.gov/environment/emissions/state/>



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For all of these reasons, SWEEP urges the Planning Commission to recommend approval of the Commercial Parking UDC Test Amendment to the City Council. We look forward to the continued work with the City on its transportation electrification efforts. Thank you for the opportunity to submit these comments.

Caryn Potter
Manager, Utility Program

SWEEP is a public-interest organization promoting greater energy efficiency and clean transportation in Arizona, Colorado, Nevada, New Mexico, Utah, and Wyoming in order to save consumers money, protect the environment, and build a more resilient, robust economy.