

**From:** [Scott Berger](#)  
**To:** [\\*CI-StPaul>Contact-Council](#)  
**Subject:** Electric Vehicle Charging Zoning Study - public comment  
**Date:** Tuesday, March 5, 2024 8:51:24 AM

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Dear Saint Paul City Councilmembers,

Thank you for considering updates to the city code regarding EV charging and preparation for future EV charging, such as EVSE (charger) installations. My first thought is that this appears only to apply to surface parking lots requiring site plan review, not structured. Maybe I missed structured parking in there? If this excludes structured parking as written, please amend it to cover structured parking.

Structured parking already necessarily has electrical wiring due to lighting, elevators, and such, whereas surface lots may or may not have had lights or electrical circuits. Therefore, this would seem to be a larger burden on surface lots relative to their build-out costs and plans, which I'm not really opposed to. It's been well established that surface parking lots, like those surrounding Allianz Field, are a blight to our city, encourage trash build-up, and make it generally unpleasant to spend time in these areas.

My second thought is that we should probably make developers meet a higher threshold to get approval for ANY new surface parking. At least in more urban areas I would make them not only have wiring for 80% of parking spots, but require actual installed EVSEs for EV drivers in all 80% of the spots.

The recently-adopted SAE J3400 connector standard also allows for "bring your own cable" type chargers. I think this is a good idea for new urban installations as it will discourage vandalism (since cables would be supplied by the driver), and allow for a cleaner appearance when not in use.

I would also consider advocating for some kind of legislation for tying in EV charging fees in these lots to the customers' electric bills, although renters would probably make that troublesome to enact. Basically, I'm not sure we want "free" charging to become the norm. Driving an EV should still be less favored or encouraged than transit use, walking, or biking.

Overall this looks like a fairly good start. Wiring for charging and circuits themselves have a relatively small cost, especially on new builds. Then again where I work in Stillwater there are 240V posts all over the parking lots (Lowell Park), but none of them have been opened up for public use, so there needs to be continued efforts made to actually encourage parking lot owners to actually finish the job and offer actual EV chargers or at least access to outlets that exist. There will need to be additional measures and follow-up to ensure that Level 2 charging actually proliferates in these parking lots.

Thank you for your consideration.

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