

Memorandum



CITY OF DALLAS

DATE May 21, 2026
TO Honorable Members of the City Council Economic Development Committee: Jesse Moreno (Chair), Paul Ridley (Vice Chair), Lorie Blair, Laura Cadena, Zarin Gracey, Bill Roth, Chad West
SUBJECT EV Charging Infrastructure Requirements, Research Overview and Peer City Analysis

On March 25, 2026, the Economic Development Committee directed staff to further evaluate electric vehicle (EV) charging infrastructure requirements and explore potential alternative policy frameworks prior to formal Council consideration of additional code amendments.

Specifically, the Committee requested that staff:

1. Explore a potential alternative framework informed by the City of Austin's EV charging infrastructure requirements; and
2. Evaluate the potential inclusion of minimum EV Installed space requirements in addition to the existing EV Ready and EV Capable categories.

This memorandum provides an overview of the research conducted to date, including peer city analysis, industry trends, implementation considerations, and preliminary policy concepts currently under evaluation. Staff will return to the Economic Development Committee within the next few months with stakeholder input, formal recommendations, and potential draft code amendments for further discussion and direction.

Background

Electric vehicle adoption and charging infrastructure expansion are central to the Dallas Comprehensive Environmental and Climate Action Plan (CECAP), particularly Goal 3: Sustainable Transportation. The plan establishes targets that include:

- 1,500 public charging outlets by 2030
- 14% community EV adoption by 2030
- 50% community EV adoption by 2050
- Full electrification of the City's municipal fleet by 2040

In March 2026, City Council discussed proposed amendments to the Dallas Building Code and Dallas One- and Two-Family Dwelling Code related to EV charging infrastructure requirements. During those discussions, concerns were raised regarding the proportionality of EV-capable requirements for large parking facilities and the potential impact on development costs.

As part of that discussion, Council directed staff to continue researching alternative frameworks and implementation strategies before advancing additional amendments.

Current Dallas Framework

Dallas currently requires EV charging infrastructure based on the number of parking spaces provided, with existing code provisions primarily focused on EV Ready and EV Capable infrastructure. Although staff generally interpreted and applied the requirements using the number of parking spaces provided, the adopted code language did not explicitly state this methodology. Following adoption of the City's parking reform amendments, questions arose regarding how EV requirements should be applied in developments where parking minimums were reduced or eliminated. As a result, one of the primary purposes of the March 25, 2026 code amendment was to clarify the methodology for calculating required EV spaces and to provide greater consistency and predictability for applicants and staff.

Generally:

- EV Capable spaces include conduit and electrical capacity to support future charger installation.
- EV Ready spaces include wiring and electrical infrastructure necessary to support charger installation.
- EV Installed spaces include operational charging equipment.

Recent Council discussions focused primarily on:

- Whether EV requirements should apply to parking spaces provided versus parking spaces required
- Potential caps on EV Capable requirements for large parking facilities
- The proportionality of requirements for different occupancy types
- The relationship between electrification goals and economic development impacts

Peer City Research

Staff reviewed EV charging infrastructure policies and implementation approaches from multiple jurisdictions, including Austin, San Antonio, California, Chicago, Boston, Seattle, Atlanta, and other municipalities.

Research identified several common policy trends:

- Occupancy-based requirements are becoming increasingly common
- Multifamily and workplace occupancies frequently receive the highest requirements
- Small project exemptions are frequently utilized
- Caps are often implemented for large parking facilities
- Requirements commonly apply to parking spaces provided rather than parking spaces required
- Utilities and automated load management systems are increasingly integrated into implementation strategies

Research also showed that many jurisdictions are attempting to balance electrification goals with affordability, utility infrastructure limitations, and economic development considerations.

Implementation During New Construction

Research consistently indicates that installing EV infrastructure during new construction is substantially less expensive than retrofitting existing facilities. Retrofitting existing parking facilities often requires:

- Trenching
- Demolition and reconstruction
- Utility upgrades
- Additional labor and engineering costs

Several studies found that retrofit costs may be multiple times higher than infrastructure installed during original construction.

Occupancy and EV Adoption Trends

Research suggests that multifamily residential occupancies and workplace charging locations have the strongest relationship to long-term EV adoption because they provide reliable, recurring charging opportunities.

Occupancy type also impacts EV charging demand and utilization patterns. For example, lodging and hotel uses may experience different charging behaviors due to shorter vehicle stay durations, valet operations, higher parking turnover, and varying guest travel patterns when compared to multifamily residential developments.

Studies also identified challenges related to “garage orphans,” or residents who lack access to private garages or home charging opportunities. Multifamily charging infrastructure and public charging networks were identified as important tools to address these gaps.

Market and Economic Considerations

Research also showed that luxury multifamily and high-end commercial developments frequently install charging infrastructure voluntarily as a market amenity. However, affordable housing and mid-market developments are less likely to voluntarily install infrastructure without regulatory requirements or incentives.

Studies additionally identified several recurring barriers:

- Utility upgrade costs
- Demand charges
- Split incentives between landlords and tenants
- Utility interconnection delays
- High upfront infrastructure costs

Operational and Internal Review Considerations

Staff evaluated the operational impacts associated with EV charging infrastructure implementation, including:

- Plan review impacts
- Inspection considerations
- Utility coordination
- Fire Department access and safety
- Mixed-use occupancy review complexity

Internal review teams noted that mixed-use developments and detached parking structures often create additional review complexity, particularly when determining occupancy classifications and calculating applicable requirements.

City of Austin Research Findings

As requested by the Economic Development Committee, staff coordinated with the City of Austin regarding implementation experiences and operational impacts.

Development Community Response

Austin staff indicated that they have not experienced substantial residential pushback related to EV infrastructure requirements. According to Austin officials, residential builders generally view EV infrastructure as a market benefit.

Austin also indicated that requiring conduit-only infrastructure in some cases helped reduce cost concerns associated with wiring and electrical equipment installation. Commercially, Austin reported occasional clarification requests and review discussions during plan review, but no major escalated concerns related to implementation costs.

Operational Lessons

Austin staff indicated that:

- Mixed-use developments and detached parking structures created the most frequent review challenges
- EV review requirements have not significantly increased review timelines
- Internal checklists and guidance documents have helped streamline implementation
- Utility coordination thresholds occasionally create additional review complexity

Austin additionally noted that projects exceeding 400 amperes of EV-related electrical demand are removed from expedited review pathways and require full review.

Policy and Implementation Lessons

Austin staff reported:

- No major policy modifications currently being considered
- No widespread implementation concerns identified to date
- Limited measurable data regarding long-term charger utilization because many projects remain under construction

Austin also noted that they have provided limited implementation flexibility for some residential builders whose projects were already in advanced permitting stages when requirements were adopted.

Policy Considerations and Tradeoffs

Staff identified several policy considerations and tradeoffs associated with EV charging infrastructure requirements.

Economic Development Considerations

Potential concerns identified include:

- Upfront infrastructure costs for large parking facilities
- Potential impacts to affordable housing development
- Utility-side infrastructure costs, including potential off-site electrical system upgrades needed to support increased charging capacity and long-term power demand.
- Increased costs for smaller developments and businesses
- Electrical capacity limitations in certain areas

Research also showed that many jurisdictions implement exemptions and caps to reduce impacts on smaller projects and to avoid disproportionate infrastructure requirements for large parking facilities.

Climate and Adoption Considerations

Potential benefits identified include:

- Reduction of future retrofit costs
- Increased charging accessibility
- Support for CECAP goals
- Increased charging access for multifamily residents
- Increased public charging visibility
- Reduction of barriers to EV adoption

Operational Considerations

Implementation considerations include:

- Utility coordination and transformer capacity
- Fire Department access requirements
- Accessibility and ADA considerations
- Pedestrian clearance and sidewalk impacts
- Plan review and inspection coordination
- Electrical load management

Equity Considerations

Research identified potential equity considerations related to:

- Multifamily residents
- Areas lacking existing charging infrastructure
- Public charging accessibility
- Lower-income households without private charging opportunities

Preliminary Policy Concepts Under Evaluation

At this time, staff is continuing to evaluate several potential policy concepts. These concepts are still under review and do not represent final staff recommendations.

Potential concepts under evaluation include:

- Occupancy-based EV infrastructure requirements
- Caps on EV Capable and EV Ready requirements for large projects
- Small project exemptions
- Multifamily exemptions tied to dwelling unit counts
- Credits for EV Installed spaces
- Fee-in-lieu programs, including consideration of the administrative structure, fee calculation methodology, departmental oversight responsibilities, and the absence of comparable peer city models identified during preliminary research.
- Utility coordination and infrastructure exemptions
- Fire Department accessibility limitations
- Encouragement of Automated Load Management Systems (ALMS)
- Increased implementation of charging infrastructure at City facilities
- Public charging strategies aimed at reducing charging deserts

Next Steps

Staff will continue coordination with stakeholders, developers, utilities, peer cities, and internal departments to further evaluate the potential impacts of various EV charging infrastructure approaches.

Staff anticipates returning to the Economic Development Committee within the next few months with:

- Stakeholder feedback
- Refined policy recommendations
- Potential code amendment concepts
- Additional implementation and cost analysis

The future briefing will seek Committee direction prior to initiation of any formal code amendment process.

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Conclusion

Staff welcomes additional feedback from Council Members prior to posting the item for Council action.

If you have any questions, please contact Emily Liu, yu.liu@dallas.gov.

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