



August 26, 2024

CHIP Testimony on Revocable Consents for Battery Swapping and Charging Cabinets

Thank you for holding this hearing today. I am Adam Roberts, Policy Director for the Community Housing Improvement Program (CHIP). We represent New York's housing providers, including apartment building owners and managers. Our members operate New York's one million units of rent-stabilized housing, which makes up 40% of its rental housing and the vast majority of its affordable housing.

Lithium ion batteries are a significant danger to our members, their employees, and their tenants. Existing policies and laws limit the ability of building staff to act when a tenant is using their apartment illegally as an e-bike charging station or repair shop. Therefore, we appreciate the Mayor's and DOT's effort to provide programs for battery swapping and the installation of charging stations. However, as currently designed, this program would not have prevented the deadly fires that occurred in our members' buildings.

Critically, charging stations can only be installed, "adjacent to a property where the ground floor has a commercial or manufacturing use." Therefore, residential buildings without commercial space cannot install charging stations. This leaves many, if not most, residential buildings unable to have a charging station.

Furthermore, by limiting charging stations to being adjacent to commercial and industrial space, charging stations could negatively affect street visibility and loading zones. Commercial spaces rely on street visibility to garner customers and loading zones to keep their products stocked. We have seen the impact that unsightly sidewalk sheds have had on commercial activity for these storefronts. The council should explore the impact of charging stations as well.

Lastly, the cost burden of charging stations is prohibitive. By choosing to implement charging stations through the city's revocable consent system, owners will be required to pay for the installation, maintenance, and electrical for these stations. This adds up to tens of thousands of dollars, making it unaffordable. Rent-stabilized housing is facing a major financial crisis, meaning buildings do not have the income to cover the cost of these stations.

As currently envisioned, this program would effectively allow for charging stations to be installed in front of residential buildings with ground floor commercial space, that do not already have obstacles blocking access to that commercial space, and are in highly profitable free market buildings. There are only a handful of buildings where this would seem possible. Tenants and workers in rent-stabilized buildings without commercial space would see little benefit from this program, putting them at continued risk from e-bike fires.

We hope to work with the Administration and DOT to amend this program so that it can protect a greater number of New Yorkers. Thank you.