



Comments Re: City of Philadelphia EV Task Force Policy Recommendations

These comments are written on behalf of Philadelphia Climate Works, a labor-community coalition advocating for local policies that will reduce carbon emissions by creating high-quality jobs and tangible social benefits for a diverse and growing number of impacted constituencies. We'd like to thank the Managing Director's Office of Transportation and Infrastructure Systems and the Electric Vehicle Task Force for the opportunity to review and comment on the Electric Vehicle Policy Task Force Draft Policy Recommendations.

We appreciate the thoughtful analysis of the social equity impacts of planning for electric vehicle infrastructure and the inclusion of the Electric Vehicle Task Force's guiding values. We believe that an impactful expansion of electric vehicle infrastructure should have the potential to benefit all Philadelphians, and so we request that you place a greater emphasis on solutions that will have the greatest impact on carbon emissions and air pollution for everyone.

We believe that an equitable and impactful plan should also include strategies for the City to make electric vehicles more accessible to low-income communities. For example, the City could design an incentive for low-income residents to transition to EVs by implementing a two-year tax exemption for households earning a yearly income less than \$28,000.

Strategy 2.1: We ask that the Task Force encourage the City to prioritize charging docks in publicly-owned parking lots and garages, and to prioritize identifying assets with parking that are available in most neighborhoods to make them accessible for public use, like schools and recreation centers.

Strategy 2.2: We ask that the Task Force strongly recommend that the City adopt EV-ready construction requirements for new buildings with parking, and renovation projects. The City should also consider strategies to incentivize large residential buildings with parking to retrofit and adopt EV infrastructure, and make it easy for resident at any multi-unit housing with dedicated parking to install chargers at their parking spot.

Strategy 2.8: We strongly advocate for the City to pursue funding available through the VW Settlement and Volkswagen ZE Funds to go towards public EV infrastructure planning and City EV fleets.

Strategy 3.1: We ask that the Task Force urge the City to work with SEPTA, Amtrak, and NJ Transit to accelerate the deployment of new EV infrastructure and set a target date to transition all diesel-burning transit options to full electric. The City should work with SEPTA to coordinate an analysis of the areas facing the greatest air pollution impacts and prioritize EV bus deployment in those areas.

Strategy 3.2: The Task Force should strongly recommend that the City take the lead in transitioning their light-duty fleet to electric with the greatest priority given to departments with the greatest vehicle miles traveled, like the Philadelphia Water Department. In this way, the City has the potential to make a larger impact by targeting their greatest sources of tailpipe pollution, which could address air quality-related health outcomes, ensure that the EVs acquired by the City will be well-utilized, and save the City money in the long-run because of the cheaper operational costs associated with maintaining EVs. We also encourage the City to explore options given by the VW Settlement to transition the City's garbage truck fleet to electric, and work to incentivize private entities to do the same.

Strategy 4.1: We agree that the City should develop a flexible policy framework that encourages innovation and experimentation. The City should consider technologies that allow for electric vehicle charging using renewable energy generated on-site. Retrofitting existing parking lots with solar roofs is a good model that has already been implemented in the city, like the solar canopies at Lincoln Financial Field, and there are other technologies available that allow for EVs to be charged with energy generated on-site. The City could also consider working with PECO to purchase off-site solar and wind electricity for EV charging projects similar to Austin's public electric utility program, Plug in Austin, which fully powers its EV charging stations with Texas wind energy. The City should consider these options to address the challenges associated with reducing carbon emissions while increasing electricity use.

Strategy 4.2: We would also advocate for the City to create policies that encourage taxi, car-share, and for-hire services to adopt and use EVs. A potential taxi stakeholder for the City to work with to encourage EV adoption is the Alliance Taxi Co-Op, a member-owned company that works to provide taxicab service for marginalized communities.

Furthermore, the City should make EVs more accessible to low-income Philadelphians by developing a pilot program for shared EVs. The Task Force should recommend that the City and SEPTA work together to complete an analysis or work to compile existing data to identify the low-income geographies struggling with transit accessibility issues. This analysis could include demographics, commute distance and time, modes of transportation used (cars, carpooling, public transit, etc.), and accessibility to public transit options so those areas can be prioritized first deployment of EV carshare deployment.

There are several great models for Philadelphia to consider including, the BlueLA car share program, Los Angeles' new all-electric car sharing program serving low-income residents. Their model is a public-private partnership between an international car sharing service provider, Blue Solutions and the city's Department of Transportation funded through a \$1.7 million state grant. The program will provide 100 EVs and 200 charging stations to five neighborhoods with significant low-income populations at a rate between 15 to 80 cents per minute of drive time. They also offer a 25% rebate for those who pay by the minute, or a 40% discount applied to the monthly subscription fee for users with certain low-income levels.

The City should also reference Portland, OR's EV advocacy group's carshare model, Forth. The organization researched areas inaccessible to mainstream carsharing programs and public transportation options, selected an affordable housing complex in the Cully neighborhood because of their transit limitations, and worked with a local CDC, Honda and their utility company, Pacific Power to fund and install three EVs and charging stations available for residents.

Finally, the Task Force should refer to the Greenlining Institute's report titled, "[Electric Car Sharing in Underserved Communities](#)," which includes additional low-income EV carsharing models, and details several best practices for designing a successful EV carsharing program. Some of those best practices include: work with community-based organizations first for outreach and optimal parking locations; provide education on the carsharing program services and electric vehicle and charging station use with in-person orientations and multilingual support services, especially for those without internet access or smartphones; and to forge public-private partnerships with charging station companies to improve costs.

We thank the Electric Vehicle Task Force and the City for taking the steps necessary to plan for the expansion on EV infrastructure in Philadelphia. Our hope is that your Offices will continue to correspond with the public and with our coalition so that our stakeholders can contribute to shaping and supporting the work to be done. We look forward to viewing the final plan and to future opportunities for public participation.