



December 2, 2024

Re: 12.2.24 - T&E Committee Agenda Item (d)1; Electric Vehicle Fleet and Charging Infrastructure Status Report – Public Comment: Did the City buy any electric vehicles in 2024? If not, why not? (And other important questions)

Honorable Chair David Cohen and Members of the Transportation and Environment Committee:

We are San José Community Energy Advocates, a volunteer community group that advocates for renewable energy and reducing GHGs, and Mothers Out Front Silicon Valley, a grassroots group of volunteers advocating for a livable climate for all children. Together, we represent over 2500 South Bay residents, the majority of whom live in San José. We appreciate Staff’s efforts to electrify San Jose’s fleet, with Council’s support. And, we have several concerns and questions about not moving swiftly enough to decarbonize our City fleet with all of the relevant information and policies needed to assess and deliver true progress.

Summary:

According to the Electric Vehicle Fleet and Charging Infrastructure Status report (2024 EV Status Report), the City does not appear to have bought any electric vehicles in the past year. In light of the City’s climate goals, and the fact that the City’s 2023-24 and 2024-25 operating budgets showed that there was \$8 million and \$13 million, respectively, available for replacement of the non-public safety fleet, not purchasing any EVs is unacceptable. On the other hand, the 2024 EV Status Report also reports that during the first three 2024 calendar quarters, year-to-date, Santa Clara County residents purchased tens of thousands of electric vehicles, demonstrating that the City needs to follow its residents’ lead in reducing emissions from transportation.

Analysis:

The City of San Jose appears to have purchased either no or just a few electric (EV) or hybrid vehicles this past calendar year. We don’t know how many exactly as both the 2023 and 2024 fleet status reports indicate the City has nearly 250 EVs/hybrids. The City did add 40 charging stations this past year. The December 2023 fleet update last year indicated that “*All-electric and hybrid vehicles make up nearly 12% of the City’s fleet inventory, equating to **nearly 250 vehicles**, with 200 current charging stations throughout Citywide facilities and another 20 charging stations coming online with the new Fire Training and Emergency Operations Center.*” This year the 2024 EV Status Report indicates that “*All-electric and hybrid vehicles make up nearly 12% of the City’s fleet inventory, equating to **nearly 250 vehicles**, with 240 current charging stations throughout Citywide facilities.*” We are especially disappointed that no electric vehicles were purchased given that there was a \$7,500 federal direct-pay EV cash incentive this year, which might be terminated next year.

Given the intensifying climate crisis, the City’s September 2019 Climate Emergency Resolution, and the City’s November 2021 Carbon Neutrality 2030 Resolution, **we believe that the presentation of this**

status report to the full City Council should include the following nine items of additional information:

- 1) **How many non-public safety light-duty vehicles were purchased in calendar year 2024 to date? Of these, what percentage were electric?**
- 2) **Of the “229 new vehicle acquisition requests across the City,” what percentage of these are for electric vehicles? How many of the 67 non-public safety requisition requests noted in the report can be filled with electric vehicles?**
- 3) Tables 1 and 2 on page 3 of the 2024 EV status report on their own do not yield information about the fuel-source of the vehicles. **Could Table 1 be expanded to show the number of existing City fleet vehicles of each type of fuel source (gas, renewable diesel, propane, all-electric and hybrid fuel mixes) and could Table 2 be expanded to show the Current Acquisition Requests broken down into the same categories?**
- 4) The 2024 EV Status Report states that “The City’s past fleet vehicle replacement budget has averaged \$1.25-1.5 million per year for non-public safety vehicles and \$6 million per year for public safety vehicles, which combined is about the same as the projected average annual EV purchase costs.” **If any gas light-duty non-public safety vehicles were purchased this year, why weren’t electric vehicles purchased instead?**
- 5) **What is the City’s internal green fleet policy?** The 2024 EV Status Report makes reference to this policy. The internal policy posted on the City’s website, the Green Fleet Policy - City Administrative Policy #5.1.10, is dated 2007, essentially before EVs were widely available. The 2007 policy indicated: “The primary measure of the City’s success in accomplishing the above objectives is the annual progress toward meeting the goal of reducing vehicle emissions by 25% by the year 2012-13.” In the past, the City Council has asked for the green fleet policy to be updated, and staff has also indicated it had plans to update it. It will soon be 20 years old, and its success measure date is already over ten years old.
- 6) Not all “alternative fuel vehicles” are zero-emission. **Does the internal green fleet policy prioritize battery electric vehicles over other alternative fuel vehicles?** Page 2 of the 2024 EV Status report states that “approximately 50% of the vehicles use alternative fuels, including renewable diesel, propane, and all-electric or hybrid fuel mixes. All-electric and hybrid vehicles make up nearly 12% of the City’s fleet inventory.” This implies that 38% of the fleet are powered with renewable diesel and propane, both of which generate more greenhouse gas emissions than SJCE’s electricity. Since renewable diesel, propane, and hybrid engines all generate more greenhouse gas emissions over their lifecycle than battery-electric vehicles (BEVs), it’s important that the City prioritize BEVs over other types of vehicles, even though the state of California fails to differentiate between alternative fuel vehicles. Furthermore, it’s also important that the City proactively reject hydrogen fuel cell vehicles since 95%-98% of hydrogen is currently produced with fossil fuels.
- 7) The 2023-24 operating budget showed the fleet replacement budget was forecast for \$8 million and the adopted budget was \$18 million. Staff told us verbally last year that the other \$10 million was for the Police Department Fleet (might have been public safety), and the \$8 million was for other General Fund fleet budget funds. The 2024-25 operating budget shows the fleet replacement budget was forecast at \$13.4 million and adopted at \$23.7.¹ We assume the \$10 million difference is again for police/public safety vehicles. **We suggest that staff provide a footnote in the operating budget on this significant difference between forecast and adopted amounts. Furthermore, as we noted above, staff states that the replacement budget has averaged**

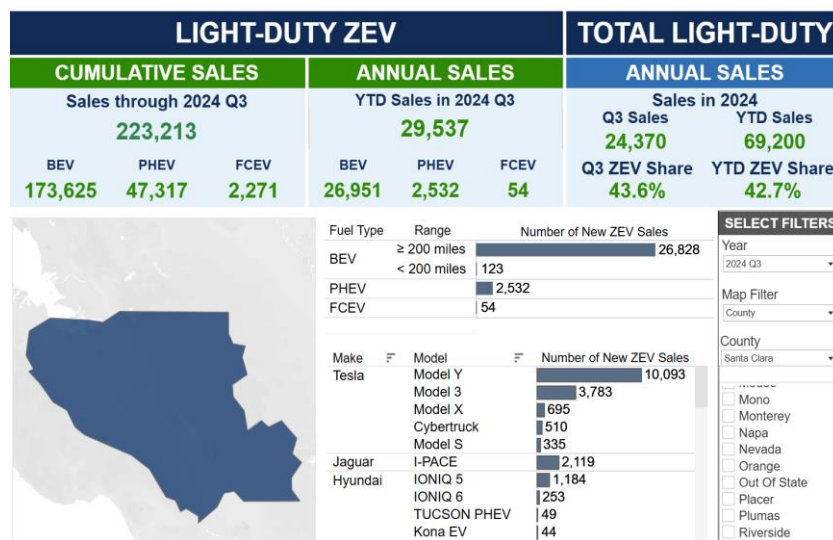
¹ [638659678802030000](#) pdf page 5

\$1.25-1.5 million per year for non-public safety vehicles and \$6 million per year for public safety vehicles. Is the difference between these figures and the adopted operating budget amounts, carried over for use in the next fiscal year?

- 8) Staff notes that in 2024-25, they will explore options including new procurement models, whereby vendors provide fleet operators with access to chargers and/or vehicles without the fleet operator needing to own or maintain them. Nonetheless, until the City moves to another procurement model, **is it City policy that any new purchases must be electric if possible?** This seems prudent given the number of years vehicles are in service, the very low maintenance requirements for EVs, and the substantial investment the City has already made in EV charging infrastructure.
- 9) Although neither the Green Fleet Policy or the ACF requirements include public safety vehicles, San Jose received three new Mach-E police cars in 2023. These patrol units can fully charge at the beginning of a shift, and if necessary, quickly charge during a shift. **How are the Mach-E police cars working out?**

As we stated previously, when the internal Green Policy was enacted in 2007, electric vehicles were not widely available. Now, SJCE lists 156 EV models on its shopping tool webpage [Electric Vehicles](#). Many of these have a range of around 300 miles, at similar prices as gas-powered cars when the federal Inflation Reduction Act (IRA) direct-pay incentive is used—and are less expensive to maintain over the lifetime of the vehicle. At Direct Current Fast Charging stations, some EVs can charge to 80% in less than 20 minutes and many within 30 minutes. These new developments mean that EVs can charge very quickly. San Jose should be able to purchase light-duty electric vehicles with so many choices available now.

The 2024 EV Status Report also reports on some great news with respect to emission reductions. 43% of new vehicles purchased by Santa Clara County residents for the first three quarters of 2024, representing 26,951 EVs and 2,532 plug-in hybrids, and is most likely the highest percentage of new zero emission vehicle sales for any county in the State and the country. With San Jose Clean Energy providing 84% GHG free electricity, of which 60% is from renewable energy, the emissions reductions are significant. Here is the Santa Clara County information from the State website referenced in the 2024 EV Status Report: ²



² [New ZEV Sales in California](#)

We recognize that the City of San Jose faces budget constraints. Other constraints are EV availability especially for specialized vehicles. However, prices for EVs have declined and, in many cases, EVs are less expensive than gas-powered cars in total cost of ownership due to much lower maintenance and fuel costs. Furthermore, we reiterate that the Inflation Reduction Act currently allows municipalities to use the \$7,500 direct-pay EV tax credit. Also, other jurisdictions are moving forward with aggressive EV fleet policies. For example, the Zero-Emissions Vehicles for New York City Act (ZEV4NYC) approved on September 28, 2023, requires NYC to begin purchasing only light and medium duty ZEVs beginning in July 2025, and heavy-duty ZEVs in July 2028, both with limited exceptions.³

We appreciate Staff's work on fleet electrification. However, it's time to aggressively increase the percentage of light-duty electric vehicles in our City fleet in order to reduce the GHG emissions that the City has direct control over. San Jose needs to continue to be a leader in the climate crisis fight. Both locally and globally, climate impacts are causing widespread devastation. In our 2023 public comments on the fleet update, we noted that San Jose experienced several days of unhealthy air quality from the wildfires in Northern California and Oregon. In September 2023, Spain, Greece and Libya experienced catastrophic flooding, which killed thousands of people, while the devastating August wildfires in Maui killed hundreds.

Closer to home, recently in October 2024, San Jose experienced a longer and hotter record-breaking heat wave.⁴ Beginning on September 30, the eight-day heat wave temperatures were 94, 99, 104, 101, 97, 97, and 103, ending on October 7 at 102 degrees! And elsewhere there were deadly and costly weather events, such as Hurricanes Helene and Milton in the Southeastern United States made worse by climate change, and other extreme weather events around the world. These extreme weather events will continue to occur as the increasing levels of CO2, which peaked at 426 parts per million (PPM) in May, continue to accelerate. The May 2024 levels were 3 PPM higher than in May 2023.

Conclusion

The City of San Jose needs to follow the lead of its residents in buying more electric vehicles. Just as San José Community Energy Advocates and Mothers Out Front Silicon Valley successfully advocated for San Jose Clean Energy, we will continue to support the GHG reduction efforts by the City and urge the City Council to do all you can to meet our 2030 net-zero emissions target, just five years away, in the most cost-effective way possible.

Sincerely,



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³ [The New York City Council - File #: T2023-3458 \(nyc.gov\)](#) and [Sierra Club-UCS Advocacy Letter to Mayor Adams re ZEV for NYC Act, June 22, 2023](#)

⁴ [San Jose, CA Weather History | Weather Underground](#)