

Town of Windsor (Jon Davis)

The Town of Windsor ("Town") appreciates the opportunity to provide comments on the proposed amendments to the Advanced Clean Fleet ("ACF") and Low Carbon Fuel Standard regulations. The Town supports California's goals of reducing greenhouse gas emissions and advancing zero-emission fleet technologies, including electrification. However, CARB should not finalize the proposed ACF amendments without further changes to protect solid waste ratepayers and the essential public services they fund.

As drafted, the rule would impose substantial near-term costs and operational burdens on municipality-contracted solid waste fleets, while leaving local communities and ratepayers to absorb the consequences. These costs will not be borne by the private haulers or the municipal agencies that contract them to provide solid waste collection; they will be borne by households and businesses through higher solid waste rates.

This is especially problematic in jurisdictions that have long-term franchise agreements aimed at stabilizing costs for their residents. The solid waste sector is already managing multiple major cost pressures, including recent costs associated with implementing other State mandates intended to reduce greenhouse gas emissions. CARB should take a more reasoned, balanced approach that will not drastically increase rates for the ratepayers.

A one-size-fits-all mandate is not appropriate for California's diverse communities. Fleet sizes, service territories, population density, topography, route conditions, and contract structures vary significantly across the state. Regulations that fail to account for those differences risk serious unintended consequences, including higher rates, reduced service flexibility, disruption of essential public services, and conglomeration of private solid waste enterprises. CARB should revise the proposal to better reflect real-world conditions and avoid shifting disproportionate costs onto ratepayers in communities that have little ability to absorb them.

Thank you,

Jon Davis

Town Manager

Town of Windsor