

Garth Schultz

While I am in support of fleet electrification generally, and believe it is appropriate for governments to take action to reduce greenhouse gas emissions, having studied this issue professionally I am very concerned about the near term cost and operational impacts to local government solid waste rate-payers. Implementing the ACF ZEV mandates as proposed will result in significant increases in costs which will ultimately be borne by the rate-payers, and not the local governments or their private industry partners. This is after many other increases in costs affecting this industry, including by not limited to the significant rate increases that were necessary to implement the greenhouse gas reducing impacts of organic waste. I am aware of no other government service sector that is as greatly impacted by unfunded State mandates as is solid waste. Please consider relaxing the requirements by changes in the timeline, considering exceptions for vehicles procured under existing contract terms with existing lifetimes, providing adequate alternative funding sources, and generally taking a more reasoned and balanced approach that recognizes the unique situations that every California community will face in implementing these regulations.