

City of El Cerrito (Christina Leard)

The City of El Cerrito 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, of which the City of El Cerrito operates curbside recycling collection programs, while leaving local communities and ratepayers to absorb the consequences. These costs will not be borne by the private haulers or their municipal agencies - they will be borne by households and businesses through higher solid waste rates. El Cerrito residents already have one of the highest collection rates in the region, and the increased costs will be passed on to them.

This is especially problematic because 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 and balanced approach. At a minimum, the Board should: extend compliance timelines where necessary; allow vehicles procured under existing franchise or contract terms to remain in service for their expected useful life; provide clear exceptions or flexibility for fleets facing unique operational, geographic, demographic, or route-related constraints; and ensure adequate funding and supporting infrastructure are available before imposing additional requirements.

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. El Cerrito has a very small fleet of recycling collection vehicles which this applies to. 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 for your consideration.

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