

## City of San Ramon - Solid Waste (Thomas Anderson)

While I fully endorse California's commitment to slashing greenhouse gas emissions and transitioning to zero-emission vehicle (ZEV) technologies, I believe the California Air Resources Board (CARB) must refine the Advanced Clean Fleets (ACF) amendments before they are finalized. In its current form, the regulation places a heavy financial and logistical load on solid waste fleets contracted by municipalities. Ultimately, these expenses won't be absorbed by private companies or government agencies; they will be passed directly to residents and businesses through increased utility rates.

This financial strain is particularly concerning given that the solid waste industry is already grappling with the high costs of complying with other recent state climate mandates. To achieve a more sustainable transition, CARB should adopt a more pragmatic strategy. Specifically, I urge the Board to:

Extend compliance deadlines to more manageable timeframes.

Grandfather in existing vehicles, allowing them to serve their full useful life if they were purchased under current contracts.

Incorporate flexible exemptions for fleets facing specific geographic, demographic, or operational hurdles.

Guarantee infrastructure readiness and sufficient funding before new requirements take effect.

California is too diverse for a rigid, universal mandate. Factors like topography, population density, and contract types vary wildly from one region to another. If the regulation fails to account for these nuances, we risk service disruptions, the disappearance of smaller waste enterprises, and unfair price hikes. CARB must revise these rules to reflect the practical realities of the industry and protect vulnerable communities from shouldering an undue financial burden.