



California Air Resources Board
Attention: Clerks Office
1001 I Street
Sacramento, California 95814

January 2, 2020

RE: Comment Letter –Proposed Assembly Bill 617 Community Air Protection Program

The purpose of this letter is to provide comments on the proposed **AB 617 Community Air Protection Program (Program) , El Centro-Heber-Calexico Corridor Staff Report** (Report) issued by the California Air Resources Board (CARB) on December 18, 2019. The proposal in the Report includes initiatives and actions that are meant to improve air quality in the El Centro area. The Report references the *Imperial County Year 1 Community Emissions Reduction Program Plan for the El Centro-Heber-Calexico Corridor (Plan)* adopted by the Imperial County Board of Supervisors. The Plan identifies key community concerns including emissions from heavy duty truck traffic. CR&R Inc. (CR&R) is the solid waste hauler for the City of El Centro and our employees live in the community of El Centro and surrounding areas. CR&R supports the recommendations in the Program Report/Plan and is committed to pursuing additional clean fuel options for heavy duty solid waste collection trucks and the associated recycling services to the El Centro community and for our employees that live there. CR&R can contribute to the Plan implementation in the area of truck emissions reduction by providing solid waste collection vehicles equipped with ultra-low NOx and PM compressed natural gas (CNG) engines that use renewable natural gas as the fuel.

CR&R is committed to providing clean and environmentally friendly service to the communities we serve in the El Centro area through solid waste collection and recycling. As a part of that commitment in other service areas, CR&R deploys clean CNG solid waste collection vehicles to reduce emissions in the communities we serve. CR&R has extensive experience with CNG heavy duty trucks, CNG fueling

11292 Western Ave.
P. O. Box 125
Stanton, CA 90680-2912

t: 800.826.9677
t: 714.826.9049
f: 714.890.6347



infrastructure, renewable fuel production (i.e. RNG), and other aspects of clean fuel deployment for heavy duty trucks.

CR&R is willing to provide CNG trucks and CNG fueling infrastructure for the solid waste and recycling work that we perform in the El Centro area. We are recommending that CARB include conversion of heavy duty solid waste collection truck fleets to clean CNG as part of the additional strategies for the Program Report/Plan recommendations for El Centro. Funding mechanisms and programs are available from the State that offer grants to purchase heavy duty CNG trucks as conversions or replacements of existing diesel powered trucks. CARB could accelerate that conversion and/or replacement process by allowing access to those grant funds under the AB 617 Plan for the replacement of heavy duty diesel trucks with clean low NOx and low PM CNG powered trucks. The air quality improvements from low emission CNG trucks will benefit the residents in the El Centro community and help to meet the implementation goals and targets specified in the Plan.

CR&R appreciates the opportunity to provide comments to CARB on the proposed AB 617 Program for the El Centro area. Please do not hesitate to contact the undersigned at johnm2@crrmail.com or at (714) 372-8281 if you have any questions or require additional information regarding our letter.

Sincerely,

CR&R Inc.

John McNamara, PG/CEG Vice President, Environmental Compliance

Attachments: none

Cc: Mr. Dean Ruffridge/CR&R