



Mr. Paul Arneja  
Air Resources Engineer, Mobile Source Control Division  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95812

April 7, 2023

**Re: CR&R Environmental Services Comments on the Proposed Advanced Clean Fleet Regulation 15-Day Language**

Dear Mr. Arneja:

On behalf of CR&R Environmental Services (CR&R), we appreciate the California Air Resources Board's (CARB) work on the proposed Advanced Clean Fleets (ACF) regulation and the opportunity to provide our comments. **We thank CARB for working with waste management providers and implementers of SB 1383 to create a pathway that provides us three additional years to transition our renewable natural gas (RNG) created from recycling organic waste away from the transportation sector.**

Founded in 1963, CR&R is a Southern California-based waste and recycling collection company, serving more than 3 million people and over 25,000 businesses through Orange, Los Angeles, San Bernardino, Imperial, and Riverside counties. We are contracted with approximately 53 cities and counties to provide waste and recycling services to support compliance with state laws. We operate one of the largest anaerobic digestion (AD) facilities in North America, and the services we provide are critical for meeting the organics diversion and short-lived climate pollutant reduction requirements of SB 1383 (Lara, 2016).

CR&R was an early implementer of the state's organic waste diversion and short-lived climate pollutant goals (SB 1383). Since 2014, CR&R has invested hundreds of millions of both private and public dollars into a state-of-the-art AD facility and associated infrastructure. When making these initial investments, CR&R planned to support the state's climate targets while recouping capital in the long-term by creating a closed loop, circular economy system that processes organic waste diverted from landfills and uses the resulting RNG to fuel our fleet of solid waste collection vehicles.

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CR&R recognizes the climate crisis calls for ambitious, zero-emission strategies, and we are preparing to transition our fleet to meet the zero-emission timelines laid out in the proposed ACF regulation. However, we still urge CARB to build a roadmap to develop new and comparable markets for RNG produced from organic waste outside of the transportation sector. Without this market certainty, CR&R is leaning towards not expanding our AD facility despite the state's need for nearly 8 million tons of additional organic waste processing capacity because we fear there will be no markets in the long-term for RNG to justify and support our investments. CR&R urges CARB to work with SB 1383 implementers like CR&R to create alternative markets for RNG that offer the same incentive that our investments were based on and further encourage new investments.

We thank CARB for continuing to work with CR&R to ensure we can continue to implement our closed-loop, organic waste recycling processes.

Sincerely,

John McNamara  
Vice President of Environmental Compliance  
CR&R Environmental Services