



TO California Air Resources Board Members and Staff

FROM CR&R Environmental Services

RE: Advanced Clean Fleet Regulation Workshop Comments

Date September 24, 2021

On behalf of CR&R Environmental Services (CR&R), we greatly appreciate the California Air Resources Board's (CARB's) work on the Advanced Clean Fleet (ACF) regulation, and the immense effort put into the workshop held on September 9th. We also appreciate your agency's decision to extend the ACF timeline to address outstanding implementation concerns, particularly the regulation's interaction with California's SB 1383 and short-lived climate pollutant (SLCP) goals.

Founded in 1963, CR&R Environmental Services is one of Southern California's most innovative and successful waste and recycling collection companies, serving more than 3 million people and over 25,000 businesses throughout Orange, Los Angeles, San Bernardino, Imperial, and Riverside counties. Thanks to groundbreaking technologies and pioneering reclamation programs, we are able to recycle over 500,000 tons of materials each year, creating cleaner communities, reducing air and water pollution, conserving landfill space, and preserving our natural resources. Our value is driven by our understanding that each community is unique, and our business model reflects the evolving demands of the environmental movement.

We have built one of the world's largest and most advanced high solids anaerobic digestion facilities, which has the capacity to recycle 335,000 tons of organic waste in just a six-acre footprint. Our projections show that our facility has an annual production of over 2 million gallons of renewable natural gas, and the ability to compost 260,000 tons of organic compost. Through this, we achieve greenhouse gas (GHG) emission reductions of over 961,000 metric tons annually. This is the equivalent of over 204,000 passenger vehicles on the road. Our significant investments in clean fuel infrastructure support our local fleets based out of Perris, San Juan Capistrano, and Garden Grove. The result of these partnerships and investments have allowed our current operation to perform better than the state's electric grid, and we expect to outperform the grid for the foreseeable future. We are extremely proud to operate California's cleanest refuse fleet.

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We would like to thank CARB's staff for working with us to understand the concerns of the refuse industry and potential conflicts with California's existing organic waste diversion regulations. Ultimately, the ACF aims to reduce emissions in the medium- and heavy-duty transportation sector. Based on our current strategies, investments, and metrics, we have achieved carbon neutrality and therefore meet the overarching goal of the ACF rule. Additionally, under the renewable natural gas pathway, CR&R's solid waste collection fleet will become permanently carbon negative in 2028, exceeding the timeline outlined in the recent workshops. If the ACF rule incorporates a performance standard, we are confident that we would exceed it.

California has ambitious climate goals, and we appreciate staff's collaboration with innovative companies like ours to meet these goals. While CR&R is supportive of the state's long-term electrification goals as part of our coordinated efforts to reduce GHGs and air pollutants, we fear if the state electrifies all sectors of the transportation sector too quickly, the state's organic waste product procurement goals will conflict with the state's vehicle electrification policies. To avoid creating uncertainty for investment in organic waste infrastructure and reducing current cost-effective markets for RNG, we request CARB create a long-term strategy that accounts for our existing circular economy.

We would like to thank your agency and staff for identifying this as an outstanding issue of concern in the most recent workshop, and we look forward to our continued efforts to ensure that our ambitious state transportation goals compliment other existing state climate goals.

Thank you for your consideration, and we look forward to working with you on this matter.

Sincerely,

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