



September 5, 2025

The Honorable Liane Randolph
California Air Resources Board Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Support for the Rescission of Advanced Clean Fleets High Priority Fleets as applies to Waste Haulers Using 1383 Renewable Natural Gas (RNG)

Dear Chair Randolph,

On behalf of CR&R Environmental Services (CR&R), I write in strong support of the repeal of the Advanced Clean Fleets rule as it applies to waste fleets running on renewable natural gas (RNG) created by their own facilities. This regulatory change will be critical in ensuring we can continue to be a carbon negative essential service and innovator.

CR&R Environmental Services has long been a leader in the development of climate-friendly, closed-loop waste collection and processing. In 2016 we made a historic investment of over \$72 million into an anaerobic digester so that our waste collection fleet could run on 1383 RNG – RNG created from diverted organic material. This was the largest and one of the earliest investments of this magnitude into anaerobic digestion of organic waste in California. In fact, the project was the first in-state RNG project to connect to the SoCalGas pipeline, creating construction and operations jobs. CR&R has also invested around \$106 million to upgrade our fleet of waste collection trucks to run on cleaner burning 1383 RNG. We have been a leader in creating systems for source separation of waste organic material, preventing landfill methane emissions. We then use that same material to make low-emission RNG to displace high emission diesel engines.

These kinds of investments are based on decades-long projected financial returns. For these investments to pencil out, we need to be able to continue fueling our fleet with the cleaner fuel we produce. More importantly, to encourage the expansion of our anaerobic digestion projects, there needs to be certainty in the credit market. Currently, our RNG generates valuable LCFS credits through the offsetting of diesel emissions. Without the credits, it's completely infeasible financially, as 1383 Gas is much more expensive to produce than other natural gas.

California is already struggling to meet the goals of SB 1383, our Short-Lived Climate Pollutant Reduction Strategy. There is not enough demand in non-agricultural areas for products created from diverted organic waste, such as compost. We help bridge that gap and reduce methane emissions by creating a product from diverted organics that can be used in urban areas – 1383 RNG.

We support CARB's mission of reducing the state's emissions, but we are best able to help achieve that goal when we can use RNG trucks for our collection fleets. We urge the adoption of the proposed repeal of the High Priority Fleets section of the Advanced Clean Fleets regulation so that we can continue running our carbon-negative services.

Sincerely,



Alex Braicovich
Senior Vice President, Environmental Services
CR&R Environmental Services