



November 7, 2025

The Honorable Lauren Sanchez
California Air Resources Board Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Amendments to the Low Carbon Fuel Standard

Dear Chair Sanchez,

On behalf of CR&R Environmental Services (CR&R), I write in support of the proposed amendments to the Low Carbon Fuel Standard to allow for book-and-claim accounting of RNG to produce electricity for electric vehicle charging, if the electricity is generated using a linear generator, with a key amendment.

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.

Anaerobic digestion projects are a critical element of the infrastructure matrix necessary to achieve organic waste diversion and responsible biosolid management. Because of the expense and emissions of transporting organic matter and compost, anaerobic digestion can often be the only economically and environmentally feasible way to manage organic waste in urban environments. However, this technology relies on a stable, well-paying market for the renewable natural gas (RNG) it produces. The proposed amendments to LCFS expand the market for this RNG and help support the mid transition. However, this amendment only helps in-state organics diversion if it applies exclusively to RNG produced in California. For this reason, we request the draft changes be amended to only allow this RNG LCFS credit pathway for in-state RNG producers.

We appreciate the ongoing support for the LCFS system and look forward to further strengthening RNG's position as we work to decrease the greenhouse gas impacts of hard to decarbonize industries.

Sincerely,



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