



April 17, 2026

Steven Cliff
Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Comments on Modified Statement of Reasons for the Advanced Clean Fleets Regulation State and Local Government Fleets (April 2, 2026)

Dear Dr. Cliff,

On behalf of CR&R Environmental Services, we would like to thank you for the opportunity to comment on CARB's Advanced Clean Fleets regulatory process. Unfortunately, the proposed 15-day rule changes represent a significant change in the scope of the regulations by including a large private industry within a *public* fleet requirement. We align ourselves with the comments made in the letter by the Resource Recovery Coalition of California, WM, and others. However, we also have additional specific concerns that were not included in that letter. These concerns are specific to companies like ours that are running their fleets on carbon-negative renewable natural gas made by our own organics recycling program. These concerns are outlined below.

Founded in 1963, CR&R Environmental Services (CR&R) is a Southern California-based waste and recycling collection company, serving more than 3 million people and over 25,000 businesses in Orange, Los Angeles, San Bernardino, Imperial, and Riverside counties. CR&R is contracted with approximately 60 local entities to provide waste and recycling services that support compliance with state laws. With over 2,200 employees, many of whom work under a collective bargaining agreement with Teamsters Local 396, CR&R has long been a leader in the development of climate-friendly, closed-loop waste collection and processing. CR&R also owns and operates one of the largest Anaerobic Digestion facilities in North America, providing critical environmental services which meet the State's organics diversion and short-lived climate pollutant reduction requirements under SB 1383 (Lara, 2016). In addition, these state-of-the-art investments also meet the waste stream circularity requirements of SB 54 (Allen, 2022).

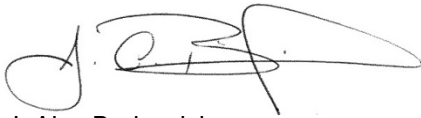
CR&R fuels many of our waste collection vehicles using 1383 Gas — this is renewable natural gas generated from the anaerobic digestion of diverted organic waste at our facility. Section 2013.6 (h) of the proposed amendments appears at first to be an acknowledgement of the carbon negative system we run. However, it only allows new vehicles that run on newly added RNG capacity to be exempt from the Milestone group equation, and only if fueled at the site where the gas is created. This does nothing to ease the burden for companies and jurisdictions that have already invested millions of dollars into 1383 Gas capacity. Although “excess renewable biofuel” is not defined, it appears to include only gas capacity not used the prior year. This means the Milestone requirements would still apply to the thousands of trucks we already run on the 1383 Gas we create. Attempting to transition this fleet to ZEVs would render the entire economic structure that underpins our digester — generating LCFS credits from the use of our 1383 Gas as transportation fuel — infeasible. It would also put in jeopardy the millions of dollars in State grants that we were fortunate to receive as part of our Renewable Natural Gas development.

Additionally, because of the broad geographic reach of our services, most of our trucks are not actually fueled at the same site where our anaerobic digester is located. Instead, the 1383 Gas is added to the SoCal Gas pipeline and pulled out where it makes logistical and environmental sense to fuel our trucks. This additional requirement in the proposed amendments that requires trucks to be fueled at the location of the digester prevents eligibility for most of our fleet and severely undermines positive environmental impact of our Anaerobic Digester.

We would respectfully request that the Advanced Clean Fleets amendments **not** pull private, contracted waste fleets into a regulation narrowed by the Board to public fleets. However, if future fleet regulations do carve out a path for waste trucks fueled by the 1383 Gas, it must be done in a way that supports the companies that took early action, encouraged by the State of California, to pursue this climate beneficial technology.

CR&R has been a pioneer in circular economy waste collection and processing in California for decades and hopes to see our investments in circular, carbon-negative fueling supported going forward. Again, on behalf of CR&R, I greatly appreciate your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Alex Braicovich', with a stylized flourish extending to the right.

J. Alex Braicovich
Senior Regional Vice President
CR&R Environmental Services