



October 22, 2018

The Honorable Mary Nichols and Members of the Governing Board California Air Resources Board  
Post Office Box 2815  
Sacramento, CA 95812

**RE: FISCAL YEAR 2018-19 FUNDING PLAN FOR CLEAN TRANSPORTATION INCENTIVES**

Dear Chair Nichols and Members of the Board:

On behalf of Republic Services, I would like to thank the California Air Resources Board (ARB) for the opportunity to comment on the proposed Fiscal Year 2018-19 Funding Plan for Clean Transportation Incentives from the Greenhouse Gas Reduction Fund (GGRF). This source of funding has been a key market incentive as the solid waste industry transitions to low carbon alternatives to diesel.

As you know, refuse trucks are active in all neighborhoods across this state. Our transition to low NOx engines and alternative fuels has had an immediate impact on lowering our carbon footprint and air quality impacts in disadvantaged communities. Working through our local jurisdictions, we have been an active participant in the HVIP program and we value the incentives that this program offers by not only providing environmental benefits but also helping lower the financial impact of fleet conversion in all of the communities that we serve.

Republic Services is very disappointed that the 2018-19 Funding Plan proposes to change the current voucher program to focus only on repowers to encourage new low NOx truck purchases in other vocations and eliminating the refuse sector. In past years, we have been active participants in the program and we have advocated specifically for additional funding from the legislature for the HVIP program. Now we find ourselves eliminated from the very program that we have supported!

As the staff report indicates, approximately 61% of the funds subscribed to for the 2017-18 voucher program as of June 30, 2018 came from the refuse sector. We would respectfully suggest that this is a very high rate of market penetration and terminating this option from your repower proposal after our industry has so successfully engaged in earlier rounds of funding seems self-defeating.

Again, we respectfully urge the Board to reconsider and over-turn staff's recommendations to change the current voucher program to focus only on repowers of low NOx truck purchases in vocations outside of the refuse sectors. The HVIP voucher incentive for the 8.9L low NOx engine should remain available for new purchases and repowers for all vocations.

Respectfully,

A handwritten signature in black ink, appearing to read "Chuck Helget", is written over a circular stamp or seal.

Chuck Helget

Director of Government Affairs, West Area