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October 16, 2006

Members of the Board of Directors
California Air Resources Board
Attn: Clerk of the Board
1001 I Street, 23rd Floor
Sacramento, CA 95814

Re: Agenda Item #06-8-4 – Amendments to Zero Emission Bus (ZEB) Regulation

Dear Members of the Board:

On behalf of Long Beach Transit, which serves over 27 million boarding customers a year on 246 buses, shuttles, vans and boats, I would like to provide comments on the proposed Zero Emission Bus (ZEB) Regulation. I would also urge you to postpone your decision on this matter until a future Air Resources Board meeting. A postponement would give additional time for affected transit agencies, such as Long Beach Transit, to work with ARB staff to develop an alternate solution or compromise language for the regulation.

Improving air quality in California is a goal that Long Beach Transit shares with the ARB. We have been a leader in our region, and we are proud of our record for aggressively implementing strategies to reduce emissions and promote cleaner air. Long Beach Transit was one of the first transit agencies in California to convert to ultra low sulfur fuel, well before it was mandated by the ARB. We were also one of the first agencies to retrofit our fleet with particulate diesel traps. In addition, Long Beach Transit has provided a leadership role in pioneering new technology for the region, with our purchase of 47 gasoline hybrid electric buses. Other agencies in our region have taken part in this purchase, and have thus expanded the use and testing of these vehicles in regular service. These 47 vehicles, which have replaced older diesel buses in Long Beach Transit's fleet, have provided dramatically lower emissions - lower than those of either CNG or LNG buses. Fifteen additional hybrid buses are currently on order by Long Beach.

We understand the desire for ZEB technology to be a reality and we support moving towards that goal to the extent that we can do so within our current resources. However, the mandates set forth in the amendments to the current ZEB rule are completely detached from what is feasible. Fuel cell technology has not been adequately tested for reliability and quality during regular, extended-use, transit service. Because of a lack of comprehensive data, the technology is not yet worthy of forcing an industry-wide immersion into ZEB technology.

The State-mandated requirement to purchase ZEBs and infrastructure does not come with corresponding funding to comply with these regulations. The ZEB requirements outlined in the regulation are extremely cost prohibitive to Long Beach Transit. Requiring medium sized transit agencies to embark on the major capital infrastructure, technology, and training investment required by the purchase of ZEB vehicles will put a huge financial strain on our agency, and in our view will lead to severe fare increases and service cuts for the customers we serve.

We would also like to point out the hydrogen fuel tanks needed for ZEB buses would have to be located on site at each of our two operating/maintenance facilities. Since both of these facilities are located within residential areas, we are particularly concerned about safety and security issues surrounding the use of hydrogen fuel tanks. The installation of these tanks could be quite a controversial issue for the local community, and might impact our ability to operate/test ZEB vehicles.

In conclusion, more discussions and negotiations with ARB staff are needed in order to ensure that we can achieve our zero emission goals within the resources we have available, and only when ZEB technology has been adequately tested. Long Beach Transit should not be seen merely as an entity with 246 engines to be regulated. Instead, it is important to remember that those engines represent vehicles carrying 27 million real people each year, riding our buses to school, to work, to medical appointments, and to other destinations throughout our region. The requirements set forth in this regulation would impact our ability to provide service to these customers.

We appreciate the opportunity to provide our comments, and look forward to working with you achieve California's clean air goals.

Sincerely,

Laurence W. Jackson
President and Chief Executive Officer
Long Beach Transit