



August 7, 2007

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

Re: Resolution 06-28 and 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 and the Air Resources Board's (ARB) Resolution 06-28.

We understand the desire for ZEB technology to be a reality and we support moving towards that goal to the extent we can do so within our current resources. 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 the first transit agency in California to convert to ultra low sulfur fuel, well before it was mandated by the ARB. We were also the first 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, to be received later this summer.

We were pleased to have had the opportunity to speak before you at the October 2006 hearing on the ZEB Rule. As a medium-sized agency falling below the 200-bus threshold, we expressed our concern that in the event we do reach the 200 bus 'trigger', we would not have adequate time to plan, seek out funding, engineer and train in order to immediately comply with the 15% purchase requirement. We appreciate the Board's willingness to address these concerns by recommending a three-year transition period for affected agencies to implement the requirements of the rule.

At the October meeting, we also expressed some additional and more basic concerns related to the cost, reliability, and feasibility of purchasing fuel cell buses to comply with the ZEB

regulations. Fuel cell technology has not had adequate and widespread testing for its reliability and effectiveness 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.

Furthermore, 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. In addition, we believe the installation of hydrogen fuel tanks needed for these vehicles would have to be located on-site at each of our two operating/maintenance facilities, both within residential areas. We are particularly concerned about safety and security issues surrounding the use of hydrogen fuel tanks, not to mention the controversial nature of this issue for the local community. This could also impact our ability to operate/test such 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. We understand the Board will be reviewing the ZEB rule in 2009 to determine if any adjustments need to be made. We urge the Board to take some of the aforementioned concerns into account when considering zero emission bus technology and its readiness for commercialization. Long Beach Transit should not be seen merely as an entity with 246 engines to be regulated. Rather, 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 will 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