



Foothill Transit
WE DRIVE

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October 17, 2006

Dr. Robert F. Sawyer
Chairman, California Air Resources Board
1001 I Street
Sacramento, CA. 95814

RE: Proposed Amendments to the Zero Emission Bus Rules

Dear Dr. Sawyer,

Foothill Transit appreciates this opportunity to comment on the proposed amendments to the Zero Emission Bus (ZEB) regulations published September 1, 2006. Foothill Transit is committed to reducing vehicle emissions and we have made concrete changes in our fleet to demonstrate this commitment. We support the development of ZEB's, but believe that the proposed approach is flawed.

A brief four years ago Foothill Transit's entire bus fleet and fueling infrastructure was diesel fuel. Today seventy five percent of that fleet, over 200 buses, is fueled by natural gas. Foothill Transit also constructed two fast fill compressed natural gas (CNG) fuel stations, will soon open a public access CNG station, and is exploring a project to test a hydrogen enriched natural gas fuel to further drive down CNG emissions. The remainder of the fleet is operating on ultra low sulfur diesel fuel and is scheduled to be entirely replaced by 2010 with clean burning natural gas.

There are people outside the transit industry that would suggest that planning three years ahead to purchase a fuel cell bus is a reasonable timeline, but in actuality most public transit providers plan 15 to 20 years into the future to ensure compliance with Federal Transit Administration (FTA) funding requirements and to plan for an orderly turnover of aging fleets. In addition, comments have been focused on the ZEB but few have discussed the issue of the hydrogen fueling infrastructure, its cost, or the availability of fuel supplies.

Many say that Henry Ford's car is substantially to blame for our poor air quality but I suggest it was not his car but his assembly line that had the real impact. ZEB technologies deployed in splintered demonstration projects will not supply meaningful emission reductions particularly if it requires that older buses continue to operate to provide service in-place of unreliable immature technologies. These demonstrations will provide data but duplicating efforts in a willy-nilly fashion does not accelerate commercialization nor provide meaningful emissions reductions and in fact the exact opposite may be true.

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A Public Agency

Providing safe, clean, and efficient transit is the goal of most transit agencies including Foothill Transit. Failure to provide that service could put the people, who often need the service the most, back into their private automobiles many of which will inevitably be gross polluters. Please remember that safe, clean, and efficient public transit is part of the solution for the air quality crisis not part of the problem.

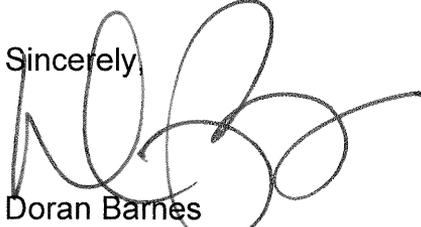
In place of the deployment of additional ZEB demonstrations as well as the timeline for the arbitrary 15% purchase requirement, Foothill Transit technical staff suggests that CARB consider a proposal to pursue the design, construction, deployment, and operation of a fleet of at least 50 fuel cell buses in a single fleet to make a genuine attempt to jump start the commercialization of that technology. That recommendation is predicated on the following:

- The availability, outside of current resources, of a funding source to purchase the bus and fueling infrastructure
- The availability of a lightweight transit bus platform
- The availability and guarantee of sufficient supplies of fuel
- Funding to support on-going operations

The providers of public transit in the State of California have been willing partners with clean air advocates making meaningful and dramatic strides in improving the air quality in this state. Foothill Transit believes that the proposed amendments could have a detrimental effect on that progress.

Thank you for this opportunity to provide comments on the proposed regulations. Foothill Transit is extremely proud to be part of California's public transit systems which are undoubtedly the cleanest in the nation. Foothill Transit stands ready to continue efforts with CARB to further reduce emissions from heavy duty transit vehicles.

Sincerely,



Doran Barnes
Executive Director