



LONG BEACH

T R A N S I T

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July 22, 2009

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 09-7-6
PUBLIC MEETING TO CONSIDER A STATUS REPORT ON THE ZERO-
EMISSION BUS REGULATION

Dear Members of the Board,

On behalf of Long Beach Transit, a medium sized, public transit agency serving over 28 million boarding customers in 2008, I would like to express my support for California Air Resources Board (CARB) staff's recommendation to defer the Zero Emission Bus (ZEB) purchase requirement.

Improving air quality in California is a goal that Long Beach Transit shares with CARB. 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, while providing transit service on board our 246 buses, shuttles, vans and boats. 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 CARB - and one of the first agencies to retrofit our heavy duty bus fleet with particulate traps. Our agency is also working to reduce greenhouse gas emissions by developing a formal, board-approved sustainability policy and participating in international, national, and statewide efforts to become a sustainable organization.

Most importantly, Long Beach Transit has provided a leadership role in pioneering new technology for the region, with our purchase of 87 gasoline hybrid electric buses. As an early investor in this technology, Long Beach Transit has paid a premium of over \$16M above the cost of regular CNG or LNG buses to further the advancement of zero and low emission technology. We have also invested a sizable amount of time and energy into the use and testing of these vehicles in regular service, attempting to increase reliability and durability to meet the minimum 12-year coach life standards required in our industry. Today we continue to face new and costly hurdles which we are committed to resolving within the resources we have available.

We believe ZEB the technology is not ready for commercialization, based on a wide variety of factors which include the cost of the bus and its current inability to meet basic performance requirements. Based on our over 8.5 million miles of experience using electronic drive trains

with our gasoline hybrid buses, there are many issues to be addressed and resolved before this technology is ready for the rigorous needs of transit service, or investment in costly infrastructure and training is made. The inclusion of reasonable performance measurements into the rule, developed in conjunction with transit agencies, will help ensure that the vehicles will be able to meet the demands of public transit operations.

As the review of the ZEB rule develops, we also urge you to consider how agencies will transition into inclusion under the rule. As medium sized transit agencies like Long Beach Transit grow their fleet across the bus number threshold, and then become considered under the rule, adequate time to develop infrastructure support and maintenance training will be needed before they can reasonably be ready purchase and maintain these new vehicles. We urge the Board and ARB staff to continue to consider this need when reviewing the rule.

Finally, we appreciate CARB staff's recognition that state funding for public transit has been continually raided, year after year. With the most recent actions by the Governor and Legislature, State Transit Assistance (STA) has been completely erased for the next five years. This has forced transit agencies into the difficult position of trying to avoid service reductions and layoffs, while still working to maintain critical infrastructure. Investing in new technology becomes more and more difficult as funding levels decrease. We would urge staff to continue to keep this fact in mind when crafting revisions to this regulation.

We thank you for your consideration of our recommendations, and appreciate the opportunity to offer our comments in an effort to achieve our common goal of reducing emissions and promoting cleaner air for all Californians.

Sincerely,

A handwritten signature in black ink, appearing to read "Laurence W. Jackson". The signature is written in a cursive style with a large initial "L".

Laurence W. Jackson
President and Chief Operating Officer