



November 30, 2021

The Honorable Michael Regan, Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: Equity and Labor Principles in the Implementation of the Infrastructure Investment and Jobs Act

Dear Administrator Regan:

On behalf of the Alliance for Electric School Buses (AESB), we write to share our enthusiasm for the new funding for electric school buses in the Infrastructure Investment and Jobs Act. The Alliance is a diverse partnership of organizations committed to the electrification of school buses and an equitable transition to clean energy. **We offer our partnership and support as the agency moves forward with policy implementation and funding allocation, and we want to share our initial views on suggested equity and labor principles that will help achieve the aforementioned goals.** We hope this letter is the start of an ongoing dialogue with you about these recommendations, and we intend to continue to work closely with the Administration as it implements its Justice40 goals.

The AESB was established in 2017 and works with local community members and stakeholders to transition from dirty diesel to zero-emission, electric school buses (ESBs), prioritizing communities most harmed by air pollution. AESB members have organized thousands of families and school districts across the country through educational workshops, petition collections, electric school bus demonstrations and tours, marches and rallies, press conferences, and citizen lobbying, succeeding in securing initial investments for ESBs for students in Arizona, California, Colorado, Connecticut, Florida, Illinois, Indiana, Maryland, Massachusetts, Michigan, Nevada, New Jersey, New York, Utah, Vermont, and Virginia.

In order to maximize the public benefits of this transition to ESBs, and to promote the goals of the Justice40 initiative, we encourage you to incorporate the following principles and suggestions in your plans to implement the Infrastructure Investment and Jobs Act:

- Prioritize the deployment of ESBs for the full \$5 billion allocated to the newly created Clean School Bus Program. While compressed natural gas (CNG) and propane (liquefied petroleum gas, or LPG) buses have lower NOx emissions than diesel, CNG and LPG engines perform equal to or worse than diesel when it comes to carbon monoxide, particulate matter, and nonmethane hydrocarbons, which can lead to ozone and smog. An analysis by Earthjustice shows that spending the money on upgraded or “clean” diesel, CNG, and propane buses would release up to 7.5 billion tons of greenhouse gas



emissions, 88 billion pounds of carbon monoxide pollution, and 12.5 million pounds of NOx.

- Ensure that Black, Indigenous, people of color, and low-income communities that bear the greatest burden of pollution receive both priority for funding *and* higher levels of funding. A thoughtful and inclusive process will be necessary to develop an implementation plan with definitions, guidelines, metrics, and variables—which may include low-income or high poverty levels, high unemployment, racial or ethnic segregation, low transportation access, disproportionate environmental burden from air pollution or climate change, and jobs impacted by the energy transition, among others—that ensure that federally-funded ESBs serve the students and communities who need them most urgently.
- Ensure that Black, Indigenous, people of color, and low -income communities — represented by parents, students, health groups, worker organizations, environmental justice, faith-based organizations, transportation equity groups, and other grassroots organizations—are part of the decision-making process to deploy new technologies and play an active role in advancing the transition to electric models.
- Adopt policies and rules that ensure training, job retention, and high job quality for student transportation employees; and incentivize the creation of good domestic jobs with family-sustaining wages and benefits in the electrical installation, Electric Vehicle Supply Equipment (EVSE), and school bus manufacturing industries.
- Promote the development of a high-road U.S. supply chain for electric school buses.
- Promote socially and environmentally responsible practices throughout the ESB and EVSE supply chains that protect communities and cultural resources, especially by incentivizing the use of alternative and recycled materials.
- Promote the use of transparent, best-value procurement procedures that encourage manufacturers to compete according to the most public benefit, including the creation of high-quality jobs.

Racial, social, economic, and environmental justice principles are the guiding force of the Alliance for Electric School Buses. The undersigned organizations hope to serve as a resource and set of trusted messengers as you carry out your goals in an equitable manner. **In addition, our members are interested in meeting with you to discuss these recommendations.**

Please contact Carolina Chacon, Coalition Manager for the Alliance for Electric School Buses, at carolina@chaconconsulting.com with any questions or concerns.

The nation's school children, communities, and workers are counting on us. Let's show them we are ready to deliver, together.

Respectfully,

Chispa Arizona
Chispa Florida, FCV



Chispa Maryland, MDLCV
Chispa National
Chispa Nevada
Clean Energy Works
DreamCorps Green for All
Earthjustice
Electric Bus Learning Project (Oregon)
Electric Bus Newsletter
Environmental Law & Policy Center
Jobs to Move America
Moms Clean Air Force
Mothers Out Front
Mothers Out Front Fairfax County
New York League of Conservation Voters
Save the Sound
Sierra Club
Union of Concerned Scientists
VEIC
WE ACT for Environmental Justice

cc: Karl Simon, Director, Transportation and Climate Division, Office of Transportation and Air Quality, U.S. EPA
Matthew Tejada, Director, Office of Environmental Justice, U.S. EPA
Marcus Holmes, Region 1, Office of Environmental Justice, U.S. EPA
Towana Joseph, Region 2, Office of Environmental Justice, U.S. EPA
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Tammi Thomas-Burton, Region 4, Office of Environmental Justice, U.S. EPA
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Ruben Mojica Hernandez, Region 9, Office of Environmental Justice, U.S. EPA
Sheryl Stohs, Region 10, Office of Environmental Justice, U.S. EPA