

March 8, 2022

Hon. Pete Buttigieg
Secretary
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Hon. Jennifer Granholm
Secretary
U.S. Department of Energy
1000 Independence Ave., SW
Washington, D.C. 20585

Re: Bipartisan Infrastructure Law Funding Opportunities for Electric School Buses

Dear Secretaries Buttigieg and Granholm:

On behalf of the undersigned members of the Alliance for Electric School Buses (AESB), we write to encourage the Department of Transportation and the U.S. Department of Energy's close cooperation with the U.S. Environmental Protection Agency (EPA) in the allocation of the Infrastructure Investment and Jobs Act (IIJA) funds that could be used to invest in electric school buses and related charging infrastructure. **We strongly urge the Departments of Transportation and Energy to work with the EPA to consider how the National Electric Vehicle Infrastructure (NEVI) Formula Program and the Charging and Fueling Infrastructure Grants for Community Charging and Corridor Charging could be used to accommodate electric school bus charging needs, in addition to those of other medium and heavy-duty vehicles.**

EPA is designing the new Clean School Bus Program (CSBP), which will provide at least \$2.5 billion, and up to \$5 billion, in funding for school districts to transition to electric school buses. School buses are the largest public transportation fleet in the country and transitioning to electric buses is a critical piece of our nation's clean energy and transit goals. Over 20 million children ride more than 480,000 school buses, of which 95 percent run on diesel. Switching to electric school buses is healthier for school children whose lungs are still developing. Electric school buses eliminate toxic air emissions, including greenhouse gases, while saving school districts thousands of dollars each year in maintenance and operating costs. Prioritizing funding for newer, electric models will help bring electric school buses to scale and promote cost parity. The EPA's new program -- especially if in conjunction with the Department of Transportation and Department of Energy's infrastructure funding -- has the potential to transform our nation's school bus fleet and clean up the air millions of children, and the communities the buses travel through, breathe each day on their way to and from school.

By pairing **NEVI Formula Program Grants and Charging and Fueling Infrastructure Grants for Community Charging and Corridor Charging Grants** with CSBP funding, school districts could leverage federal funding to achieve their electrification goals, maximizing public benefit, and creating good U.S. careers for workers in the clean transportation sector along the way. Targeting funds for communities most burdened by air pollution and historically excluded from previous funding and workforce opportunities will achieve cleaner air and better health outcomes for communities that need them most, and further advance U.S. environmental, social, and economic justice goals.

Our Alliance is a diverse partnership of organizations committed to the electrification of school buses and an equitable transition to clean energy. The AESB was established in 2017 and works with local community members and stakeholders to transition dirty diesel buses 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 grassroots lobbying, succeeding in securing initial investments for electric school buses for students in Arizona, California, Colorado, Connecticut, Florida, Illinois, Indiana, Maryland, Massachusetts, Michigan, Nevada, New Jersey, New York, Utah, Vermont, and Virginia.

Our coalition has shared our recommendations (attached) for the equitable design and successful implementation of the Clean School Bus Program with the EPA. **We offer our partnership and support as the Departments of Transportation and Energy move to allocate this unprecedented amount of funding for electric vehicle charging infrastructure.** Like you, we are eager to promote cleaner transportation that will result in healthier communities and good paying, sustainable U.S. jobs. We respectfully offer the following recommendations:

Prioritize “underserved” school districts or communities

Underserved communities are groups of people who have been intentionally and otherwise marginalized and excluded from policy, funding, and other decisions. As a result, this has denied them access to socio-economic and other opportunities – leading to less successful outcomes. Black, Latinx, Indigenous and people of color are less likely to have access to these opportunities and resources than their white, more affluent counterparts, and consequently face greater disparities. To address the impacts of decades of racist and ethnocentric policies and practices, funding decisions must ensure low-income communities and people of color receive both priority for funding *and* higher levels of funding.

We recommend that the Departments of Transportation and Energy ensure states use the Climate and Economic Justice Screening Tool, developed for the Justice40 initiative. In addition, we urge states to include additional criteria and indicators when appropriate, including but not limited to:

- Race and ethnicity, with a particular focus on cumulative impacts
- Additional air pollution indicators where data is available, such as nitrous oxides and Toxic Release Indicators; and
- Health impact disparities associated with diesel pollution.

Strengthen the EVSE workforce

We recommend the Departments of Transportation and Energy consider the following measures to ensure that program investments are safely, properly, and effectively deployed:

- Require Electric Vehicle Supply Equipment (EVSE) installation projects funded by this program employ EVITP-certified electricians in order to ensure safe and proper installation and maintain high standards in the electrical contracting industry. Include requirements, funding, or incentives to create electrical pre-apprenticeship and apprenticeship opportunities for workers from communities that have traditionally been excluded from or underrepresented in the electrical workforce, workers with barriers to employment, and displaced workers.
- Encourage states to work with EVSE providers to procure adequate training for student transportation workers (e.g. mechanics, engineers, analysts, technicians) who will be working with charging infrastructure, including offering continued training as best practices develop.
- Encourage states to require workforce impact assessments for large deployments, in order to plan for and mitigate jobs lost, disrupted, or made lower paying by the deployment of new technologies.

To the extent possible, we urge the Departments of Transportation and Energy to ensure the creation of high-wage, domestic careers through program investments, especially for workers from communities that have traditionally been excluded from or underrepresented in the EVSE workforce, workers with barriers to employment, and displaced workers. The Departments could accomplish this by encouraging states to provide higher levels of funding for projects using EVSE companies that create good U.S. careers in EV installation with inclusive hiring practices.

Incentivize sustainable supply chains and procurement practices:

To incentivize a sustainable supply chain with responsible procurement practices, we encourage the Departments to:

- Incorporate policies to promote the development of the domestic supply chain and create good paying, sustainable U.S. jobs in the medium and heavy duty electric vehicle sector.
- Consider additional reporting requirements for battery sourcing and recycled content

Additionally, regulatory policy changes are needed to ensure that the collection, recycling, and safe disposal of these critical materials is socially and environmentally sustainable across the supply chain. In addition to sustainable policies incorporated into the Clean School Bus Program, the United States must also update its mining laws, so that when mining does occur it is environmentally sustainable, respects the rights of Indigenous communities, avoids perpetuating environmental racism, and employs high safety and job quality standards.

Leverage federal dollars to ensure further transformation of fleets

To ensure NEVI funding is used effectively, we encourage the Departments of Energy and Transportation to incentivize inclusive utility investments in charging infrastructure, and/or on board batteries to reduce the upfront costs. Inclusive utility investments, approached with robust consumer protections, are financing mechanisms where utilities make site-specific investments and recover their costs with fixed charges, no increase in rates, and the charges are still within the savings between operating diesel and electric buses for school districts. These mechanisms known as Tariff on Bill Programs or Pay as You Save® have been identified by the Energy Star EPA's program as emerging models to expand the scale and deployment of the zero-emissions technologies to everyone.

The undersigned organizations are able to serve as a resource and hope this letter is the start of an ongoing dialogue as you implement this program and incorporate Justice40 goals. Our members welcome the opportunity to meet with you to discuss these recommendations in further detail. Please contact Carolina Chacon, Coalition Manager for the Alliance for Electric School Buses, at carolina@chaconconsulting.com, to schedule any conversations or to share any comments or questions. We greatly appreciate your time and consideration.

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, a program of Florida Conservation Voters

Chispa Maryland, a program of the Maryland League of Conservation Voters

Chispa

Chispa Nevada
DreamCorps Green For All
Earthjustice
Electric Bus Newsletter
Environmental Law & Policy Center
Jobs to Move America
League of Conservation Voters
Moms Clean Air Force
Mothers Out Front
Mothers Out Front Fairfax County
New York League of Conservation Voters
Save the Sound
Sierra Club
VEIC
WE ACT for Environmental Justice

CC: Michael Regan, Administrator, U.S. EPA
Karl Simon, Director, Transportation and Climate Division, U.S. EPA
Gina McCarthy, White House National Climate Advisor
Mitch Landrieu, Senior Advisor to the President for Infrastructure Coordination

Attachment: AESB Letter to the EPA 2022-01-31