

January 18, 2023

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

Re: Docket ID No. EPA-HQ-OAR-2022-0874  
Clean Heavy-Duty Vehicles [60101]

Dear Administrator Regan:

The Alliance for Electric School Buses writes to share our recommendations regarding the EPA's Clean Heavy-Duty Vehicles Program, created by the Inflation Reduction Act of 2022. In regards to the questions posed for the public to comment on:

**1. How do you see this program working in conjunction with the existing Diesel Emissions Reduction Act (DERA), the Bipartisan Infrastructure Law (BIL) Clean School Bus Program, and programs at other agencies given the overlap in vehicles that could be funded?**

While transformational, the EPA Clean School Bus Program (CSBP) can only complete part of the nation's transition to electric school buses. Additional federal funding is critical to ensuring a clean ride for kids. The EPA Clean Heavy-Duty Vehicles Program can fill current gaps with the initial funding rounds of CSBP, such as:

- Providing dedicated funding for technical assistance, which is critical to ensuring school districts in low-income and Black, Indigenous, Latinx, Asian and communities of color have the necessary resources to electrify. This technical assistance could fund software, telematics, contractors, or other services to successfully deploy, charge, maintain, and operate school buses. Technical assistance would allow planning to take place, ensuring that the technology (bus and charger) fits the needs of the specific routes requirements (mileage, altimetry, heating/cooling, and all energy demands).
- Providing additional funding for infrastructure needs beyond the customer side of the meter. These costs can be higher than the funding levels in the Clean School Bus Program, and are necessary to proceed with electric school bus deployment.
- Providing necessary training for school transportation workers, from drivers to mechanics to manufacturers who will ensure the successful deployment of electric heavy-duty vehicles.
- Incentivizing high-quality jobs for school bus manufacturing workers that will provide family-sustaining wages and benefits as well as opportunities for career advancement.
- Incentivizing inclusive hiring practices to bring workers historically excluded from the manufacturing sector into the clean energy workforce.

In terms of how this program should interact with the CSBP, DERA and other related programs, we recommend the EPA streamline applications for school districts and/or other eligible applicants that might apply for electric school bus funding. Ideally EPA could create one joint application form for electric school bus funding that would guide eligible applicants, based on their application, to the appropriate funding program or opportunity.

## **2. For which significant Class 6/7 vehicle sectors should EPA prioritize funding?**

School buses represent the largest form of public transportation in the United States, with nearly half a million vehicles carrying precious cargo: 21 million children who deserve to breathe clean air. Each school bus travels approximately 12,000 miles each year, through the neighborhoods where our families live and children play. Diesel school buses emit harmful toxins that can lead to cancer and heart disease, as well as worsen preventable respiratory illnesses like asthma. Diesel pollution has also been shown to impact students' test scores and academic performance. For children whose lungs and brains are just developing, these are devastating consequences.

Transitioning the nation's school bus fleet from diesel to electric will have a significant impact across health, environment, and even grid reliability. School buses are especially well suited for electrification because of their duty cycle; they can charge when they're not in use during the day or at night. They can even be used as backup batteries that store energy and return to the grid during peak demand. Moreover, they produce zero tailpipe pollution, which will improve children's health, boost their academic performance, and reduce climate-harming pollution. Best of all, this transition will protect our most vulnerable population and remove dangerous pollution directly from the neighborhoods where our families live.

Additionally, as mentioned above, the CSBP alone is not enough to meet the EPA's goal of making electric school buses the American standard. The White House originally proposed a \$20 billion program for transitioning to electric school buses; Congress proposed \$25 billion through the Clean Commute 4 Kids Act, and negotiations whittled funding down to \$5 billion -- and only \$2.5 billion is guaranteed for zero-tailpipe-emission buses. Using the Clean Heavy-Duty Vehicles Program to accelerate school bus electrification will have myriad benefits and help the EPA reach its most important goals.

## **3. How can EPA ensure the benefits of this program reach low-income and disadvantaged communities?**

The EPA must prioritize higher funding levels AND immediate funding for the communities most impacted by air pollution, which are disproportionately low-income communities and Black, Indigenous, Latinx, Asian and people of color. To achieve this prioritization, the EPA must consider factors such as poverty, air pollution, public health (such as asthma indices), race and Tribal affiliation. The EPA could also target this funding at deploying electric school buses in pollution hotspots: near depots, high-traffic corridors, and areas in nonattainment status. The EPA could refer to its own EJ Screen to inform how to identify these priority target populations.

These communities must also be authentically engaged and consulted throughout this process to ensure they understand the benefits of the transition and the opportunities available. The EPA can do so by partnering with local, community-based organizations and leaders.

Another way to ensure equitable access to this program is by making the application process simple and easy for understaffed and under-resourced communities. Whether through a rebate or grants mechanism, funding should be distributed upfront, before cash-strapped school districts, municipalities or bus operators have to pay for the vehicles. If the EPA considers creating another competitive grant program, it should also evaluate the costs associated with applicants drafting and submitting competitive grant applications, which generally requires hiring talented grant writers.

Overall, for under-resourced, understaffed and low-income school districts to even consider applying for the program, the EPA will need to provide additional and dedicated technical assistance, either through the Agency's own offices or in partnership with other federal agencies working towards increasing access to and readiness for zero-emission technology in the communities most impacted by transportation pollution.

**4. What should EPA consider in the design of the program to encourage grantees to support high quality jobs and adhere to best practices for labor standards, consistent with guidance such as Executive Order 14063 on the Use of Project Labor Agreements and the Department of Labor's Good Jobs Principles?**

We urge the EPA to ensure the creation of high-wage, family-sustaining domestic careers through program investments, especially for workers from communities that have traditionally been excluded from or under-represented in the manufacturing workforce, workers with barriers to employment and displaced workers. EPA could accomplish this through one or more of the following measures:

- Require OEMs to certify vehicle models that can be purchased using CHDVP funds. This certification can include requirements for manufacturers to provide public, enforceable commitments on the creation of well-paid jobs in the U.S.; EPA can score these commitments to ensure that the production of school buses creates good domestic manufacturing careers with inclusive hiring practices.
- Encourage school bus operators to procure buses using best value solicitations where possible and include manufacturing job quality as a factor in evaluating bids.

**5. What metrics should this program use for measuring success and ensuring accountability?**

We recommend that the EPA collect the following data:

- Number of electric school buses deployed, and as a percent of the fleet
- Specific locations where buses will be parked (e.g., depots, lots)
- Information on approximate areas served by electric school buses

Additionally, we recommend that the EPA match this data with health burden and air pollution data for the bus locations, routes and areas served by award recipients to better understand what improvements to air quality (and nonattainment status) and health the EPA-funded electric school bus deployments are achieving. If at all possible, the EPA should collect data before and after deployment to measure emissions reductions -- of criteria pollutants as well as greenhouse gas emissions -- enabled by the program funds.

We also encourage the EPA to collect and share feedback after funding has been distributed to learn how electric school buses are performing in real time. Identifying good experiences and challenges or barriers can help fellow school districts. Data on chargers and ports used, uptime, downtime, range, maintenance issues and costs, fuel costs and efficiency, use and impact of Vehicle to Grid if applicable, whether school districts will pursue further electrification, and other details could also help the EPA learn how to help other school districts transition -- with the understanding that reporting can be time-intensive for school districts, and should be streamlined as much as possible. Where contractors, vendors or other third-parties or partners can assist with reporting, this should be allowed.

Lastly, as the EPA aims to enable a rapid transition to zero-emission vehicles, tracking vehicle costs over the program's duration would help determine how EPA funding is impacting the creation of a healthy ZEV market. The EPA could and should encourage third-parties to leverage federal funding and provide cost share, such as through inclusive utility investments, especially for non-priority school districts or applicants. This would help ensure that the upfront cost of electric school buses is reduced and they can reach cost parity with diesel buses as soon as possible.

We thank you for the opportunity to share these recommendations, and look forward to our continued partnership with the EPA to ensure cleaner air and healthier futures for our communities, starting where they're most needed.

Respectfully,

Chispa Arizona  
Chispa Florida, a program of Florida Conservation Voters  
Chispa National  
Clean Energy Works  
DreamCorps Green For All  
Earthjustice  
Electric Bus Newsletter  
Environmental Law & Policy Center  
Jobs to Move America  
League of Conservation Voters  
Moms Clean Air Force  
New York League of Conservation Voters  
Sierra Club  
Southern Alliance for Clean Energy  
Virginia Clinicians for Climate Action  
WE ACT for Environmental Justice