April 6, 2026

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

Re: Docket ID No. EPA-HQ-OAR-2025-1806
Clean School Bus Program RFI

Dear Administrator Zeldin:

On behalf of the Alliance for Electric School Buses, our partners, and the millions of members we collectively represent, we appreciate the opportunity to submit comments and materials to the Environmental Protection Agency's (EPA) Request for Information (RFI) regarding the Clean School Bus Program (CSBP).

Electric School Buses: The Most In-Demand Option

As EPA noted in the RFI, the Clean School Bus Program was established to fund the replacement of existing school buses with clean school buses or zero-emission school buses, as well as charging or fueling infrastructure. The Infrastructure Investment and Jobs Act (IIJA) requires EPA to award at least 50%, and up to 100%, of funds made available for awards in a fiscal year to replace existing buses with zero-emission school buses. In today's market, battery-operated electric school buses are the only zero-emission school buses available for purchase.

Electric school buses have been the most in-demand option for school bus fleets applying to the Clean School Bus Program. 91% of past applicants chose -- as the program is completely voluntary -- to request funding for electric school buses. As EPA has stated, thousands of school districts have been placed on waitlists in previous rounds, most seeking support to electrify their fleets. **We strongly urge EPA to continue prioritizing funding for electric school buses and their charging infrastructure, in alignment with overwhelming demand from schools across the country.**

Electric school buses are a worthwhile investment in our children's health; protecting children's environmental health is foundational to the EPA's mission, as recently noted in the agency's new policy declaration. Electric school buses have no tailpipe, eliminating children's exposure to toxic diesel pollution that has been linked to lung and heart illnesses, chronic respiratory conditions like asthma, and even cancer. Pollution from diesel vehicles also hurts brain development, lowers test scores, and increases school absences. Children are more vulnerable to these health impacts due to their developing brains and lungs, their higher respiratory rates, and increased exposure from time spent outdoors playing. Children who already suffer from asthma and children in low-income families, children with disabilities, and Black and Indigenous children are more likely to ride the school bus and are especially affected. No child should experience these harms just to get a ride to school. Electric school buses remove this pollution from the spaces where children spend time: on and near the bus. They also protect the health of bus drivers, teachers, and the communities where these vehicles travel.

Electric school buses are also saving school districts money. While they cost more upfront, electric school buses provide a lifetime of savings in fueling and maintenance. Average electricity prices are lower and much more stable than average diesel fuel prices, a fact we are painfully cognizant of today. Electric drivetrains are also more efficient than internal combustion engines, averaging a lower cost per mile and reducing maintenance costs by 40-60%.

Additionally, electric school buses offer a benefit no other type of bus does: They are a grid asset. Through managed charging, electric school buses tap into the grid at the times most convenient for electric utilities, helping avoid additional infrastructure, and keeping costs low for all ratepayers. Through bidirectional charging and vehicle-to-grid technology, electric school buses are sending energy back to the grid during times of peak demand and earning school districts thousands of dollars in revenue. Electric school buses can serve as integral components of virtual power plants or grid-isolated microgrids, providing back up power to local communities during emergencies or extreme weather events. At a time when utilities face increasing demand for electricity, and new data centers look for load and flexibility, electric school buses can strengthen the grid, make our communities more resilient, and keep electricity rates affordable.

Only electric school buses can provide these critical benefits to children, schools, ratepayers, and our communities. EPA must adhere to the Infrastructure Investment and Jobs Act and continue awarding at least 50%, and up to 100%, of funding each fiscal year for electric school buses and their charging infrastructure.

Grants Structure Recommendations

In its future grant opportunity, we also recommend that EPA consider the following recommendations to strengthen the program's impact on the children and communities it is meant to serve:

Incentives

Match Incentive Levels for 2024 Rebates. We urge EPA to offer the same incentive levels for electric school buses that were offered during the now-cancelled 2024 Rebates, plus inflation. This would provide program continuity and help school districts, who previously applied but were rejected due to the round cancellation, budget for their transportation needs with certainty.

Fund Smart and Bidirectional Charging. Electric school buses are assets to the electric grid when they optimize managed charging, and even more so when they send energy back to the grid. EPA should continue to fund electric school bus infrastructure, particularly managed charging software and bidirectional chargers that will allow school buses to contribute to the electric grid's resilience.

Additional Support for Priority School Districts. We urge EPA to continue prioritizing high-need, rural, and Indigenous school districts, as outlined in the statute, either by providing them with higher levels of funding, awarding them first in the selection process, or awarding additional points to applications from these communities. Children in low-income families, children with disabilities, and Black and Indigenous children are more likely to ride the school bus and are especially affected by diesel pollution.

Prioritization

Allow Self-Certification for Large School Districts. As EPA did in previous rounds of the program, we urge the agency to continue allowing large Title I-funded school districts to self-certify as low-income or high-need to be considered a priority for funding. Many Title I school districts have pockets of wealth but serve predominantly low-income communities and, as such, fell outside prior Small Area Income and Poverty Estimates (SAIPE) Program thresholds. EPA should require documentation verifying that program-funded school buses will serve routes in low-income neighborhoods to ensure compliance.

Selection Criteria

More Points for 2024 Rebates Applicants. Applicants to the 2024 Rebates spent significant time and effort on their applications, which were collectively rejected after waiting over a year for updates from EPA. If they apply again in 2026, they will need to start their applications from scratch to meet new grant guidelines. EPA should offer these applicants additional points in the selection scoring system in recognition of their prior interest in the round that was canceled through no fault of their own.

More Points for Projects in Communities with Dirtiest Air. As with the 2023 Grants round, EPA should award more points to projects located in counties in nonattainment of the agency's air quality standards for ozone and particulate-matter pollution. Taxpayer-funded clean school buses should benefit children breathing the dirtiest air.

Scrappage

Provide Flexibility with Scrappage Requirements. As EPA has heard from many school districts, scrappage requirements can pose a burden to low-income, rural, and Indigenous school districts that do not have or cannot spare a bus to scrap in exchange for a new model. During the 2023 Grants round, EPA provided priority school districts with an option to waive scrappage rules if they met certain criteria. We urge EPA to reinstate this waiver for the 2026 Grants. Additionally, we recommend EPA consider how timelines for scrapping existing buses and placing new buses into service intersect. Ideally, EPA's timelines give school districts adequate time to put new buses into service and optimize their performance *before* disposing of the buses being replaced, though supply chain constraints and delivery delays have at times prevented this. EPA should consider what flexibility school districts may need meeting scrappage requirements.

Date & Reporting

Collect Additional Data. We urge EPA to continue collecting data from recipients on the locations replacement school buses are serving, so that the agency can then use that data to compare it with data on health burden and air quality to report on program impact. We also urge EPA to track how many EPA-funded school buses are serving students with disabilities, such as by reporting on the number of school buses awarded with wheelchair lifts or other ADA compliance tools. Children with disabilities are more likely to ride the school bus, are currently more exposed to diesel tailpipe emissions as they wait for and enter the bus from the rear, and deserve a clean ride.

In response to the questions listed in EPA's Request for Information, we provide the following answers.

A. Alternative Fuel School Buses

2i. Availability

Most of the alternative fuel school buses EPA lists in the RFI are not readily available for purchase. No manufacturer currently produces LNG or hydrogen school buses. New CNG buses were discontinued from production in 2024. Only one manufacturer currently produces propane school buses (Blue Bird), limiting price competition as well as servicing and support options for school districts. Propane school buses have already been funded through the Clean School Bus Program, as were CNG school buses when they were available for sale.

Diesel buses can be modified to run on biodiesel, renewable diesel, or renewable natural gas, but there are no buses with engines specifically designed to run on these fuels. EPA has stated multiple times that the Clean School Bus Program is a replacement program; it would be contrary to the law's intent and program structure to fund fuels that are not replacing diesel buses.

Electric school bus models, meanwhile, are available from 13 manufacturers. **Funding alternative fuels like LNG, hydrogen, CNG, and biofuels that are not readily available or proven would be confusing, even misleading, for school districts and a waste of taxpayer funds.**

2ii. Demand

Speaking to Clean Cities coalitions and school bus dealers across the country, the consensus is that school district interest has not materialized for LNG or hydrogen buses, and demand has not been sustained for CNG school buses. Only a few schools have procured biofuels to power their buses.

Propane industry representatives have often said that their product does not need federal subsidies. Therefore, EPA should not waste taxpayer dollars on school buses that school districts and bus operators can purchase without federal support.

Demand for electric school buses is evident from prior Clean School Bus Program rounds and from growing adoption rates. **Given school district demand, investing in zero-emission school buses is the best use of taxpayer dollars.**

B. Alternative Fuels for Use in School Buses

2i. Availability

Renewable diesel and renewable propane are largely sold in the four states that have Low Carbon Fuel Standards: California, Washington, Oregon and New Mexico. Renewable fuels are only in the piloting stage in a few places outside of the West Coast.

Biodiesel is more available, but is blended into conventional diesel fuel, usually up to 20%. This means its benefits are largely limited, as buses that run partially on biodiesel are still operating mostly on diesel. (Higher blends, such as B100, are not accepted by school bus manufacturers and could void the bus warranty if used without approval.) As EPA has previously stated, the Clean School Bus Program is a replacement program that can fund new buses and chargers, but not fuels. In all previous rounds, propane and CNG fuels were not eligible expenses. Similarly, biofuels should not receive funding in future rounds.

Additionally, in 2023, EPA explained why funding biofuel school buses would be impractical and not meet the replacement requirement:

> *"EPA knows of no unique biofuels engines or buses at this time. Diesel buses can run on a mix of regular diesel and biodiesel, making it very difficult to ensure that biofuel blends of a certain percentage are used exclusively in the vehicle from the start, much less over the vehicle's lifetime. There are no differences in emissions standards between a regular diesel bus and one that may use biofuels as an in-use fuel."*

We fully agree with EPA that the program cannot and should not fund biofuels. Without adequate measures to ensure compliance, funding biofuels would leave the program wide open to fraud, waste, and abuse.

2iii. Fuel Supply Arrangements

Propane is a byproduct of methane gas processing and crude oil refining, making the fuel dependent on fossil fuel production. If at any point the supply of petroleum is low or becomes inaccessible, school districts depending on propane for fuel would be affected, especially as propane deliveries for household heating are prioritized. According to the U.S. Department of Energy, this can happen due to a variety of factors, such as peak demand in the winter and extreme weather events straining supply. Additionally, as more and more propane is exported outside the United States, these supplies could be further limited.

2x. Performance and Operations in Extreme Weather Conditions

Biodiesel blends can also create cold-weather operability risks because they may begin to crystallize or "gel" sooner than conventional diesel as temperatures fall. The U.S. Department of Energy's Alternative Fuels Data Center notes that cold-weather performance of biodiesel blends depends on the blend level, the feedstock, and the characteristics of the petroleum diesel that the biodiesel is blended with. According to the National Renewable Energy Laboratory (NREL), pure biodiesel can begin to gel at temperatures ranging from 27 to 60 degrees Fahrenheit. The Department of Energy also notes that blends with smaller percentages of biodiesel perform better in cold temperatures than blends with higher percentages of biodiesel.

There is real-world evidence that cold weather affects what blends fleets actually use. A survey of biodiesel blends in the United States conducted during the winter of 2009-2010 found that cold states had an average biodiesel content of 12%, while warm states had an average biodiesel content of 19%. The researchers concluded that the decreased biodiesel content in cold states was likely due to "deliberate reductions to meet the cloud point expectations." This underscores the broader concern that it is difficult to ensure that a specified biodiesel blend is actually used over time, and shows how issues with operability in cold weather can push fuel users towards smaller percentage biodiesel blends. School buses running on smaller percentages of biodiesel blends, such as 20% (B20), are still running 80% on conventional petroleum diesel and are not displacing diesel school buses.

2v. Emissions

Diesel buses running on biofuels, propane, CNG, and LNG buses still emit tailpipe emissions that are harmful to human health and particularly dangerous for children. These alternative fuel school buses are not zero-tailpipe-emissions like electric school buses. WRI used the AFLEET tool to calculate tailpipe emissions, and found that all alternative fuels emit tailpipe emissions that are equivalent to or worse than diesel for at least 4 key pollutants. Both biodiesel and renewable diesel produce the same tailpipe emissions as conventional diesel buses for particulate matter, nitrogen oxides, volatile organic compounds, and carbon monoxide. With propane, CNG, or E85, putting children on these buses would expose them to *more* tailpipe pollution than they would riding a diesel school bus. This is not acceptable. These fuels do not actually deliver a meaningful reduction in the dangerous air pollution that children are exposed to when they ride the bus.

For lifetime emissions, multiple studies have demonstrated that electric school buses are substantially cleaner than models powered by fossil fuels. In 2023, WRI calculated the per-mile carbon emissions associated with electric, diesel, and propane school buses in regional electricity grids across the United States, finding that electric school buses emit significantly less carbon pollution than propane and diesel buses, half as much in some regions. In 2024, the Union of Concerned Scientists found in a well-to-wheels analysis -- looking at pollution associated with fuel extraction, refining and distribution, and vehicle operation -- that electric school buses emit 80% less climate pollution over their lifetime than any other school bus type, whether gasoline, diesel, propane, or natural gas. In terms of greenhouse gas emissions, electric school buses beat propane in every single state, across every single grid mix.

The answer is clear. In terms of emissions and their impact on the environment and public health, electric school buses are the cleanest option today and must be EPA's priority for this program.

C. Fueling Infrastructure for Alternative Fuels

8. Constraints

Biodiesel and especially renewable diesel fueling stations are not widely available throughout the country. School districts across dozens of states and hundreds of counties would need to ship these fuels to their sites and install the necessary infrastructure. The same is true for propane, CNG, and renewable CNG; school districts must ship tanks to their depots. The Clean School Bus Program can fund charging and fueling infrastructure, but not the fuels themselves.

Issues with cold-weather performance for biodiesel also have implications for fueling infrastructure. When biodiesel gels, it can clog filters on dispensing equipment and even become too viscous to pump. School districts would need to take additional measures to ensure biodiesel performance in cold weather climates, making biodiesel less of an improvement over existing technologies.

It is imperative that, when helping school districts fund new infrastructure, the Clean School Bus Program invests in the cleanest, healthiest and most suitable technologies.

D. School Bus Industry Supply Chain and Purchasing Practices

1. Supply Chain Constraints

In prior rounds of the Clean School Bus Program, EPA allowed school districts and other recipients to request extensions for close-out forms and other reporting requirements on a case-by-case basis. This helped many school districts who faced unexpected infrastructure or bus delays due to supply chain disruptions, for example for switchgears and transformers required for charging infrastructure installation. We urge EPA to continue to provide this flexibility in its future funding opportunity.

2. Standard Purchasing Processes

Based on our conversations with school districts, dealers, and pupil transportation associations, it is standard practice for school districts to provide at most a down payment -- and not always -- when ordering a bus. The full payment is not made until the bus is delivered and functioning. We urge EPA to streamline the grants opportunity so that it does not alter these practices, as they are common-sense and ensure that school districts have leverage to acquire a quality, timely product.

4. Streamlining School Bus Purchasing

We recommend that EPA allow state agencies, green banks, groups of school districts, or other not-for-profit or governmental entities to conduct aggregate procurement for school bus orders across multiple school districts. This would encourage competitive or bulk pricing and help school districts negotiate better rates. This was done in 2022 when EPA awarded state agencies in South Carolina and Delaware, who conducted aggregate purchases for school districts in their states.

One example of how this can be achieved comes from Michigan. The Michigan School Business Officials (MSBO) Bus Purchase Program issues an invitation to bid to interested dealers, who then provide proposals that include pricing details and bus specifications. The MSBO compiles these solicitations into a price list and shares it with school districts electronically. School districts receive access to transparent information that helps them unlock competing pricing. The MSBO also helps school districts coordinate bus purchases. This is one way that price transparency can be made standard across similar regions or states.

5. Cost-Share Funding Levels

If EPA moves forward with setting cost-share requirements, we urge the agency to set them at reasonable levels to encourage program participation rather than disincentivizing it. School districts are often underfunded and struggling with complicated budgeting cycles that may not align with federal programs, and this is especially true for transportation costs. The U.S. federal government has numerous programs with smaller cost-share requirements while still maintaining efficiency. For example, most highway project funding is 80% federal with a 20% state or local cost-share.

E. Oversight and Fraud Prevention

2. Financial Framework Assessments

We support EPA assessing the financial stability and compliance adherence of OEMs and other for-profit third parties applying directly for funding. Given the experience with Lion Electric, school

districts deserve certainty and reliability in their industry partners. Taxpayer funds should not be awarded to companies at risk of bankruptcy.

5. Limitations on For-Profit Entities

Payments should ideally flow through school districts to avoid self-dealing by companies who both own and sell products funded through grants. In cases where school districts are not the lead applicant, grant agreements should include school districts as a strong partner in negotiations. Otherwise, third parties have little incentive to deliver buses or services in a timely manner.

Manufacturers who are the sole makers of certain fuel bus types should be prevented from directly applying for funding. For example, Blue Bird applying for propane school bus funding directly poses a conflict of interest as they are the only manufacturer selling those buses; they are essentially self-dealing. School districts are left with extremely limited options, and Blue Bird faces no competition.

These recommendations would strengthen accountability and keep school districts in the driver's seat.

7. Payment Structures

For the program to be successful, we recommend that EPA continue providing at least partial funding upfront before a school district must make any payment. Reimbursement-only funding models disadvantage school districts who do not have the capital for such expenditures and discourage applications for electric and alternative fuel school buses, all which have a higher upfront cost. For-profit applicants have the capital to pay for buses and infrastructure upfront, and may be more accountable to timely deliveries and quality products in a reimbursement-only model.

8. Enforcement Mechanisms

We recommend that, in the event an OEM or dealer fails to deliver a school bus to the school district, EPA should hold the OEM or dealer responsible rather than the school district.

OEMs accepting awards on behalf of school districts from EPA should be contractually obligated to uphold the terms of their warranty and be held legally responsible for the duration of the grant agreement (5 years).

Additionally, we urge EPA to encourage school districts to require a Service Level Agreement (SLA) from bus and charger OEMs and dealers. In a recent webinar hosted by CALSTART, several school bus maintenance experts noted that SLAs that outline the frequency of services -- in regular intervals -- more successfully help school districts keep up with maintenance and operate their buses with little downtime.

This concludes our comments. Thank you for the opportunity to respond to the EPA's Request for Information on the Clean School Bus Program. We look forward to working with the EPA to promote grants for zero-emission school buses later this year.

Respectfully,

Acterra: Action for a Healthy Planet
Alliance of Nurses for Healthy Environments
Chispa National - League of Conservation Voters*
Chispa, League of Conservation Voters*
Clean Energy Works*
Conservation Law Foundation
CURE
Earthjustice*
Environmental Law & Policy Center*
Fermata Energy
Fresh Energy
Generation180*
GreenLatinos
Health Professionals for a Healthy Climate
Illinois Clinicians for Climate Action
It's Electric!*
Kentuckians For The Commonwealth
League of Conservation Voters (LCV)*
Maryland League of Conservation Voters*
MN350*
Moms Clean Air Force*
Mothers Out Front*
Mountain Mamas
Nevada Clean Energy Fund
New York League of Conservation Voters (NYLCV)*
Nuvve
Piedmont Environmental Alliance*
Plug In America
Respiratory Health Association
Sierra Club*
Southern Alliance for Clean Energy*
Sowing Justice
Spark Access
Texas Environmental Justice Advocacy Services
The Climate Center
WE ACT for Environmental Justice*
Wisconsin Electric Vehicle Association
ZEF Energy
UndauntedK12
West End Revitalization Association

* Members of the Alliance for Electric School Buses