

March 16, 2022

EPA Clean School Bus Program  
Via email: [cleanschoolbus@epa.gov](mailto:cleanschoolbus@epa.gov)

To Whom It May Concern:

The Northeast States for Coordinated Air Use Management (NESCAUM) offers the following comments on the U.S. Environmental Protection Agency's (EPA's) Clean School Bus Program signed into law on November 15, 2021, as part of the Bipartisan Infrastructure Law (BIL). The Clean School Bus Program represents a transformative opportunity to jumpstart decarbonization of the nation's school bus fleet and improve public health outcomes for the millions of school children and communities these buses serve.

NESCAUM is the regional association of air pollution control agencies in Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, and Vermont. Our member agencies have the primary responsibility in their states for implementing clean air programs that achieve the public health and environmental protection goals of the federal Clean Air Act (CAA). NESCAUM serves as a technical and policy advisor to its member agencies on a wide range of air pollution and climate issues. NESCAUM also facilitates the Multi-State Zero Emission Vehicle Task Force, which now includes 16 states, the District of Columbia, and the Canadian province of Quebec. These jurisdictions have committed to work together to accelerate transportation electrification, for example, by signing a memorandum of understanding to advance electrification of on-road medium- and heavy-duty trucks and buses and develop a multi-state action plan to identify barriers and propose solutions to support widespread electrification of these vehicles.

## Background

In the United States, almost half a million school buses travel 3.3 billion miles per year,<sup>1</sup> transporting 26 million school children to and from school.<sup>2</sup> Nearly all these school buses currently run on diesel, which when combusted emits greenhouse gases (GHGs) and harmful emissions of nitrogen oxides (NOx), and particular matter (PM). Diesel emissions cause and exacerbate respiratory and cardiovascular illnesses, and exposure to PM from diesel exhaust has been linked to lung cancer and other cancers<sup>3</sup> as well as impaired brain development and lower

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<sup>1</sup> Schoolbus Fleet, *2021 Fact Book – Pupil Transportation by the Numbers* (Dec. 2020), <http://digital.schoolbusfleet.com/publication/?m=65919&i=696373&p=22&pp=1&ver=html5>.

<sup>2</sup> A. De La Garza, *U.S. School Buses May Never Be the Same Thanks to Biden's Infrastructure Plan*, Time Magazine (Nov. 15, 2021), <https://time.com/6117544/electric-school-buses/>.

<sup>3</sup> American Cancer Society, *Diesel Exhaust and Cancer Risk* (July 17, 2015), <https://www.cancer.org/cancer/cancer-causes/diesel-exhaust-and-cancer.html>.

academic achievement.<sup>4</sup> Children riding in diesel school buses are more vulnerable to these harmful health impacts because their lungs are still developing, and they are exposed to high concentrations of diesel emissions while inside and near school buses.

These impacts are not distributed evenly. Students of color and students from low-income families are much more likely to take a school bus to school than their peers from higher-income families.<sup>5</sup> Moreover, exposure to diesel exhaust from school buses compounds for students of color and students from low-income families who are more likely to live in close proximity to highways, ports, power plants, warehouses and distribution centers, and other significant stationary emissions sources.

## **Recommendations**

### **1. Prioritize Zero-Emission Buses Over Internal Combustion Engine Buses**

EPA's Clean School Bus Program will provide a total of \$5 billion over fiscal years 2022-2026 to replace existing school buses with cleaner school buses, with half of the available funding reserved exclusively for zero-emission school buses and half for clean school buses. Under this program, a zero-emission bus is one with no tailpipe emissions; a clean school bus is one that reduces emissions and operates entirely or in part using an alternative fuel such as hydrogen, compressed natural gas, liquefied natural gas, propane, or biofuels, or is a zero-emission bus. Thus, given that the definition of clean school buses includes zero-emission buses, EPA may direct more than half of the available funding to zero-emission buses.

School buses fueled by natural gas, propane, or biofuels may reduce emissions if replacing older, dirtier diesel school buses currently in operation, but combustion of these alternative fuels will continue to contribute to air pollution and climate change for many years to come because school buses have an average lifetime of 12 to 15 years. On the other hand, zero-emission school buses emit no GHGs or other pollutants from their tailpipes, and battery electric zero-emission buses will become increasingly cleaner as the electric grid shifts to non-emitting renewable energy sources. Conversion of the entire U.S. school bus fleet to zero-emission buses would reduce GHG emissions by approximately 8 megatons per year<sup>6</sup> and result in significantly cleaner air in communities where buses operate. Therefore, to maximize the public health and environmental benefits of the Clean School Bus Program, EPA should prioritize awards for the purchase of zero-emission school buses.

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<sup>4</sup> W. Austin, G. Heutel, D. Kreisman, Fixing school buses is an effective (and cheap) way to improve students' health and academic performance (April 22, 2019), Brookings Institute <https://www.brookings.edu/blog/brown-center-chalkboard/2019/04/21/fixing-school-buses-is-an-effective-and-cheap-way-to-improve-students-health-and-academic-performance/>.

<sup>5</sup> U.S. Department of Transportation, Bureau of Transportation Statistics, The Longer Route to School (Jan. 12, 2021), <https://www.bts.gov/topics/passenger-travel/back-school-2019>.

<sup>6</sup> World Resources Institute, U.S. Electric School Bus Initiative, <https://wrirosscities.org/our-work/project-city/us-electric-school-bus-initiative> (visited Feb. 15, 2022).

## **2. Design a Simple, Flexible Program that Enables Broad Participation**

EPA should design the Clean School Bus Program to enable broad participation, especially from applicants that purchase school buses or provide school bus services for high-need local education agencies, Tribal schools, and rural or low-income areas. Burdensome application, procurement, and reporting requirements may limit program participation and delay project implementation.

Smaller and underserved school districts may lack the resources and expertise to navigate the project application and implementation process. Simplified application and reporting requirements will reduce barriers to participation among eligible entities without the benefit of dedicated staff and resources. To help address staffing and resource constraints and enable broader participation, EPA should consider expanding eligibility to allow state environmental agencies to apply on behalf of a state or school district that may not have the capacity and resources to complete applications and reporting requirements. Under this approach, state environmental agencies could provide rebates for the purchase of the school buses and be held responsible for all documentation and reporting requirements.

Clean School Bus Program awards can lead to more rapid deployment by avoiding overly prescriptive project requirements and providing flexibility to grantees. EPA should avoid vehicle price caps that may limit the pool of eligible vehicles for program funding and should allow fleet operators to select and procure the vehicles and equipment that best meet their needs. For example, some fleets may be able to meet their charging demand through slower Level 2 charging equipment, whereas others with more demanding duty cycles may require DC fast charging for their buses. On the other hand, EPA should consider incentive caps for each vehicle class along with a requirement that applicants combine the costs of vehicles and charging/fueling infrastructure into a single line item in their application to encourage applicants to minimize infrastructure costs. Overly prescriptive charging infrastructure requirements such as mandating the purchase of “smart” chargers or establishing a one-vehicle-per charging port ratio should also be avoided. In addition, providing rebates as cash-on-the-hood vouchers may lead to greater program participation from high-need school districts by lowering vehicle and equipment costs at the time of purchase.

In addition, EPA’s Clean School Bus Program should allow 2010 or newer diesel buses to be replaced with electric buses. This would broaden participation to include school districts and tribes in northern New England and states with cold climates where school buses do not last as long due prevalent salt use on the roads during winter. This would align with EPA’s DERA State Grants Program, which makes 2010 or newer model year vehicles eligible for replacement.

## **3. Prioritize Awards and Assistance for Replacing Buses that Serve Underserved Communities**

Given the disproportionate pollution burdens facing underserved communities, NESCAUM strongly supports prioritizing Clean School Bus Program awards for applications that will deploy zero-emission buses serving high-need local education agencies, Tribal schools, and rural or low-income areas. Prioritization of awards in these areas will help ensure that underserved

communities directly benefit from zero-emission school buses. NESCAUM agrees with the EPA approach for program awards to cover up to 100 percent of the incremental cost of a replacement bus and the charging/fueling infrastructure. In addition, EPA’s application guidelines should clarify whether award funding can be utilized for the leasing and maintenance of buses and associated charging/fueling equipment.

Further, to expand opportunities for public engagement on the Clean School Bus Program, EPA should prepare and translate program materials and resources, such as outreach letters, informational webinars, and electric school bus driver trainings, in various languages for use by stakeholders as part of its education and outreach plan.

#### **4. Align Clean School Bus Funding Timelines with Other Clean Vehicle Programs**

If possible, EPA should align the timing of the Clean School Bus Program with its DERA program. This will help avoid the possibility of states delaying funding decisions for one program while waiting to hear which projects are awarded funding under another program. Program alignment will help states more efficiently plan and implement DERA, as well as other state clean vehicle programs, which will ultimately accelerate the deployment of clean school buses by programs with similar objectives and realize more immediate climate and air quality benefits.

#### **5. Provide Guidance for Meeting Buy America Requirements**

EPA has concluded that only charging/fueling infrastructure funded under its Clean School Bus Program is subject to Buy America requirements and that buses or bus components are not. Unless EPA provides clear guidance, grantees will be left to determine which electric vehicle charging equipment meets the Buy America requirements. To streamline the process for grantees, EPA should publish a list of charging/fueling infrastructure that meets Buy America requirements.

Thank you for the opportunity provide comments on EPA’s Clean School Bus Program. NESCAUM views effective implementation of this program as critical to accelerating the transition to a zero-emission school bus fleet to help meet our member states’ clean air and climate goals.

Sincerely,



Paul J. Miller  
Executive Director

cc: NESCAUM Directors  
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