



January 18, 2023

Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

**RE: [Docket ID No. EPA-HQ-OAR-2022-0874]
Comments on Request for Information – Transportation Programs**

Dear Sir or Madam:

National School Transportation Association (NSTA) is pleased to offer comments to the Environmental Protection Agency (EPA) on its Request for Information – Transportation Programs, as published on November 4, 2022.

About The National School Transportation Association

NSTA has been the leading resource for school transportation solutions and the voice for private school bus operators for over 57 years. We are a membership organization for school bus contract-operators engaged primarily in transporting students to and from school and school-related activities. Private school bus contractors account for 38 percent of the nation’s pupil transportation services and employ more than 250,000 individuals as bus drivers, mechanics, maintenance workers, dispatch, and office workers. School transportation represents the largest form of mass transportation in the United States, and daily, almost 26 million K-12 students are transported by an estimated 480,000 yellow school buses.

NSTA would like to provide comment on the following questions with respect to implementation of the Clean Heavy-Duty Vehicle Program:

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?

NSTA believes the additional \$1 billion in grant funding available from the Clean Heavy-Duty Vehicle Program complements existing programs such as DERA and the Clean School Bus Program. As you know, the first round of Clean School Bus Program funding had restrictions, which limited direct access to funding by private school bus operators (contractors). With recent legislative amendments to the program, through the FY23 Omnibus Appropriations Act, two impediments that NSTA expressed concern with to the Agency have been addressed.

Since the implementation law for the Clean Heavy-Duty Vehicle Program did not contain the aforementioned restrictions, we are excited at the prospect that another funding stream is available for school bus operators. NSTA believes that further funding commitments can only serve to create a steady stream of opportunity in student transportation, and school buses represent the perfect candidate for this type of governmental investment – because of mostly limited range needs of the bus, compared to other Class 6/7 vehicles, as well as our intimate ties to communities across the United States, and the ability to positively affect the health status of schoolchildren.

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

National School Transportation Association

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As this initiative was being pursued during the Congressional process, it was clear to NSTA that bill drafters intended the Clean Heavy-Duty Vehicle Program to prioritize the transition of school buses to zero emission vehicles. As mentioned previously, school buses are the ideal fleet for electrification, as they affect the communities they serve on a daily basis. Overall, school buses provide the safest method of home-to-school transportation, and zero emission vehicles eliminate all harmful pollutants and improve air quality for students.

Factually, school buses, in many cases, provide the only opportunity for access to education for children across the country. Keep in mind that school buses operate on consistent routes, and are housed at the same locations, which provide the ideal operational environment for charging of electric vehicles. As school buses are not just exclusive to one region of the United States, further deployment of electric buses allow for the impact of electrification to be felt throughout the country. We believe that widespread electrification of the school bus fleet may also serve as springboard to increased public support for electrification initiatives. The yellow bus remains uniquely positioned as an American icon, and is trusted member of communities across the country. Electrifying the school bus fleet will undoubtedly increase the public's familiarity with these new vehicles.

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

NSTA members serve the full gamut of communities across the United States, and operate in rural, urban, and low-income areas that would benefit from the transition to zero emission vehicles. As mentioned previously, school buses operate in all areas throughout the country, and have the ability to serve low-income and rural communities alike. Home-to-school transportation in disadvantaged communities remains an industry priority, and in many cases, crucial as a form of educational access. We urge the Agency to embrace how school transportation represents the best available opportunity for deployment of funding in a clear, consistent, and seamless way that provides the best opportunity for the greatest return on investment.

Summary and Conclusion

In conclusion, NSTA believes that the Clean Heavy-Duty Vehicle Program will act as a compliment to the Clean School Bus Program. NSTA believes that the EPA should prioritize the program for school buses; as school buses have significant impacts on educational access in all communities across the country. Again, from conversations NSTA has had with the drafters of this program, this program was intended to be school bus centric.

NSTA appreciates the opportunity to offer comments on EPA-HQ-OAR-2022-0874, and we look forward to a continued dialogue with the Agency on the implementation of the program. If you have any questions, or further clarification on our comments is required, please do not hesitate to contact me at 703-684-3200 ext. 700, or via email at cmacysyn@yellowbuses.org.

Sincerely,



Curt Macysyn
Executive Director, National School Transportation Association