

December 26, 2023

EPA Docket Center
Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

**RE: [EPA-HQ-OAR-2023-0492; FRL 11430-01-OAR]
Transportation and Climate Division (TCD) Grant Program Reporting Templates:
Supplemental Project Application Template and Project Reporting Templates for
Diesel Emission Reduction Act (DERA), Clean School Bus (CSB), Clean Heavy Duty
(CHD), and Clean Ports Grant Programs;**

Dear Sir or Madam:

The National School Transportation Association (NSTA) is pleased to offer comments to the Environmental Protection Agency (EPA) on its Safety Fitness Determinations, as published in Volume 88 Number 207, of the Federal Register on October 27, 2023.

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. Members range from small family businesses to large multi-state operators. 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, approximately 25 million K-12 students are transported by an estimated 480,000 yellow school buses.

NSTA Supports the EPA Efforts to Ease Burdens for Grant Applicants

NSTA supports EPA efforts to ease the burden of grant applicants, therefore, supporting the proposed reporting templates. However, NSTA would like to point out several different barriers that are negatively impacting private operators that are seeking to apply for Clean School Bus Program Grants:

1. The requirement of School Board Awareness Certification

NSTA Members have identified this requirement as a barrier in the recent round 3 program – the requirement to secure signed documentation from school boards to submit a valid application. The requirement puts an additional burden on private operators. Typically, our contractor members do not have direct relationships with the school boards. According to our members, there are many instances where they are not allowed to have direct contact with the

school boards. It should be noted that these issues are not dealt with by the school boards immediately, they can be put off for an unknown amount of time. Furthermore, an “authorized representative” is a broad requirement, and some districts are not sure who would be signing off on the grant application. All of these actions typically require public meetings and votes, which complicate matters further. The combination of all of these put a significant burden on NSTA Members seeking to electrify their fleet. The second problematic required documentation from the utility provider.

2. Required Utility Documentation

Similar to the required documentation from the school board, utilities have proved to be inconsistent to work with. All of which have their own rules, and different processes for handling requests from our contractor members. As with school boards, there is not a clear timeline for requests to be met, and again, to be pushed off for months at a time. NSTA Members have also submitted requests to utilities that have just not responded at all. Contractors have encountered situations with utilities that will not sign off on a proposed project, unless it is 100% guaranteed to happen, which our operators cannot commit to due to the grant process. Other utilities require site visits, and high level plans that contractors cannot commit to before securing grant funding.

Summary and Conclusion

In conclusion, NSTA appreciates the EPA effort to streamline the application processes. However, NSTA believes that there is additional work to be done to reduce the burden on contractors applying for the Clean School Bus Program. NSTA Members are eager to electrify their fleets and take advantage of the unprecedented level of funding offered by the Clean School Bus Program.

NSTA appreciates the opportunity to offer comments on EPA-HQ-OAR-2023-0492; FRL 11430-01-OAR, and we look forward to a continued dialogue with the Agency in monitoring the results of this initiative.

If you have any questions about our position, or need further clarification on our comments is required, please do not hesitate to contact me via email at cmacysyn@yellowbuses.org, or via telephone at 703-684-3200, ext. 700

Sincerely,



Curt Macysyn
Executive Director
National School Transportation Association