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June 10, 2022

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

Dear Administrator Regan:

Recently, the Environmental Protection Agency (EPA) announced¹ its plan to distribute funds for the “Clean School Bus Program” appropriated through the *Infrastructure Investments and Jobs Act (IIJA)*. While we remain skeptical about the premise of IIJA, we believe EPA has the duty to adhere to the Congressional intent of the bill and fiduciary responsibility to the American taxpayers.

Under the Clean School Bus Program, as reauthorized under the IIJA, EPA is to award grants and rebates to replace existing school buses with clean and “zero-emission” school buses, with 50% of the funds marked for electric buses and the other 50% marked for alternative-fueled buses². According to the legislation, EPA is directed to award funds based on the lowest overall cost of bus replacement and technologies that reduce the most emissions while ensuring parity between technologies³. Based off of EPA’s April presentation, it is clear that the Agency has disregarded Congressional intent and made the unilateral decision to promote electric school buses solely.

As you are well aware, and even as the New York Times notes⁴, electric school buses are often two to three times more expensive than traditional or alternative fuel buses, with a traditional school bus costing \$100,000, an alternative fueled bus, such as propane, costing around \$105,000, and an electric school bus costing \$350,000⁵. Based on EPA’s Clean School Bus funding presentation⁶, the Agency is prepared to subsidize 100% of an electric school bus while minimally supporting alternatively fueled school buses. In fact, EPA provides a benefit of 12 to 1 to electric vehicles compared to propane. If EPA followed Congressional intent and provided an

¹ <https://www.epa.gov/system/files/documents/2022-04/2022-csb-rebates-webinar-2022-04-27.pdf>

² Pub.L. 117-058

³ *Id.*

⁴ <https://www.nytimes.com/2020/01/22/business/energy-environment/electric-school-buses.html>

⁵

https://assets.ctfassets.net/ucu418cgcnau/362sQcGinJzFxFvqFh0DBCr/cb2ee507e5c8f646ee133bfdabbccbf/02_BIue_Bird_Electric_Bus_Presentation_Truck_and_Bus_NOTES_V2.pdf

⁶ *Supra* note 1.

even playing field by making the additional \$500 million in grant funds available to alternative-fueled buses, an additional 4,000 school buses could replace current vehicles. Over the program's lifespan, this would amount to 20,000 school buses that could benefit rural, low-income, and underserved communities across the country.

Additionally, it is essential to note the idea of a "zero-emission" vehicle is a fallacy, at best. If you look at the emissions required to produce and charge an electric vehicle, the benefits of alternative-fueled vehicles become even more obvious. Cobalt, lithium, and other minerals are required to produce the lithium-ion batteries used in electric vehicles and "have been linked to grave environmental and human rights concerns⁷." One study found that 87% of children and 53% of the entire population living near rare earth mines had "markedly elevated" levels of metals in their system⁸.

According to information provided by the National Propane Gas Association, well-to-wheels carbon emissions calculations show an electric school bus emits approximately 1.11 kgCO₂eq/mile. Thus, a total investment of \$830,000 (purchase of vehicle and infrastructure) for a bus that travels 15,000 miles per year would result in an expenditure of \$49.85 per kgCO₂eq. Conversely, a propane school bus, with total well-to-wheels carbon emissions of approximately 1.70 kgCO₂eq/mile and an investment of \$165,000 (purchase of vehicle and infrastructure) would yield an expenditure of \$6.47 per kgCO₂eq for the same annual miles traveled.⁹ The U.S. Department of Energy confirms these calculations, saying simply, "EVs may not demonstrate a strong well-to-wheel emissions benefit."¹⁰

Knowing this information, the only conclusion that we can reach is that EPA is using the authority as defined under the IJJA to pick winners and losers in the transportation market. If EPA was genuinely concerned with reducing emissions, funding for the FY22 Clean School Bus Program would actually "promote parity¹¹" amongst available technologies, which would help clean the air and ensure economic viability of communities they serve.

We request the Agency to provide their rationale on funding for 2023, explain how providing a 12 to 1 benefit to a particular technology meets the requirements set forth by IJJA, and to reconsider its funding for this fiscal year and the remaining years funding.

Sincerely,



Robert E. Latta
Member of Congress



Mike Carey
Member of Congress

⁷ <https://www.nytimes.com/2021/03/02/climate/electric-vehicles-environment.html>

⁸ <https://pubmed.ncbi.nlm.nih.gov/19486963/>

⁹ Comment from M. Calderera of NPGA to U.S. Environmental Protection Agency, Stakeholder Input on Clean School Bus Program, (Dec. 21, 2021).

¹⁰ https://afdc.energy.gov/vehicles/electric_emissions.html

¹¹ *Supra* note 1.



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