



December 21, 2021

The Honorable Michael Regan, Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Ave.
Washington, DC 20450
Via email: CleanSchoolBus@epa.gov

Dear Administrator Regan:

Thank you for the opportunity to provide feedback on the Environmental Protection Agency's design of the Clean School Bus Program. The American Lung Association strongly supports a nationwide transition to electric school buses as rapidly as possible. We urge EPA to maximize the investments passed by Congress, using your authority to prioritize electric school buses and charging infrastructure under the "clean school bus" portion of available funding. Electric school buses provide significant health benefits to the millions of children who ride buses to school, all children in and around schools and to everyone in the communities where buses operate.

We urge you to make equity the priority in implementing this program. Prioritizing electric school buses and directing the investment to communities that face the greatest burden from air pollution, especially low-income communities and communities of color, will maximize the benefits.

The transportation sector causes over half of the nation's total nitrogen oxide emissions, which form harmful ground-level ozone pollution and can contribute to particle pollution. Local diesel exhaust is carcinogenic and can threaten lung health in a variety of ways.

This air pollution burden is not shared equally. The American Lung Association's 2021 "[State of the Air](#)" report found significant disparities for people of color residing in counties with failing grades for ozone and/or particle pollution. Vehicle electrification is essential to reducing harmful air pollution and improving health outcomes while also helping to address climate change. School bus electrification has the potential to deliver significant air quality and health benefits to children, but EPA must prioritize support where it is needed most.

Lower-income communities and communities of color often face disproportionate exposures to harmful pollution like toxic diesel exhaust. Lower-income communities and communities of color also experience disproportionately poor health outcomes, making health and climate equity key to the electric school bus discussion.

Children are particularly vulnerable to poor air quality due to their developing respiratory systems and higher rates of respiration. The transition to school buses with zero tailpipe emissions will benefit the health of children riding school buses, with potentially greater benefits for children from lower-income communities and communities of color who are more likely to rely on school bus transportation.

Recent [American Lung Association polling](#) on electric school buses revealed broad public support with 72% of respondents nationally saying they would prefer electric school buses in their communities instead of diesel buses. All children deserve healthy air to breathe on their way to school, not just children in wealthy districts.

School bus electrification can be a model for other electric vehicle applications in the transportation sector. EPA should prioritize program assistance in low-income schools and districts where there could be more challenges to accessing funding for electric school buses and charging infrastructure. EPA should take care to ensure that upfront costs do not place an undue burden on lower-income school districts and other end users that would like to purchase electric school buses but may lack sufficient capital. Vouchers, point of sale rebates, financing and other support mechanisms should be accessible to applicants when reimbursement delays could be a deterrent.

Phasing out diesel school buses and promoting electric school buses is a win-win-win – less climate pollution, cleaner air, and better health. Please maximize the investment in electric school buses and prioritize electric school buses and charging infrastructure under the “clean school bus” portion of available funding.

Sincerely,

A handwritten signature in black ink that reads "Harold Wimmer". The signature is written in a cursive, flowing style.

Harold P. Wimmer
National President and CEO