



CREATING GOOD JOBS, A CLEAN ENVIRONMENT, AND A FAIR AND THRIVING ECONOMY

TO: U.S. Environmental Protection Administration
RE: Recommendations from BlueGreen Alliance in Response to EPA's Request for
Input on the Implementation of the Clean School Bus Program
Updated: April 14, 2022

To Whom It May Concern,

Thank you for the opportunity to provide input on the implementation of the U.S. Environmental Protection Administration's (EPA) Clean School Bus Program. I write on behalf of BlueGreen Alliance, a coalition of labor and environmental organizations working to solve today's environmental challenges in ways that create and maintain quality jobs and build a clean, prosperous, and equitable economy.

If implemented strategically, the allocation of federal funds toward the transition of America's school bus fleet to cleaner alternatives can represent a critical pathway by which EPA improves health outcomes for school children and the communities they live in. Prioritization for domestically manufactured and assembled school buses and charging infrastructure would also funnel immediate employment and economic benefits to the workers and communities where the clean buses and charging equipment are made. The integration of strong workforce training measures would provide drivers and maintenance workers with timely career training for the future school bus fleet, and support a safe proof-of-concept for electric vehicle (EV) deployment to the broader public.

To these ends, we urge EPA to leverage its administrative discretion to:

1. Prioritize the disbursement of program funds directly to union-organized facilities in the United States making domestically manufactured buses and charging infrastructure, and to projects that utilize union-made, domestically manufactured buses and charging infrastructure;
2. Prioritize the disbursement of program funds to projects employing Electric Vehicle Infrastructure Training Program (EVITP) certified electricians to install and maintain the electronic components of electric school bus charging equipment;
3. Support the existing workforce currently operating and maintaining diesel buses by prioritizing projects that ensure and fund workforce training for school bus drivers and mechanics;
4. Encourage rigorous reporting of the impact of program-funded projects on workers, including changes in job numbers, job quality, wages, and working conditions of drivers, mechanics, and other impacted workers;
5. Ensure that grantees classified as eligible contractors or non-profit transportation associations adhere to labor standards that are equal to or

exceed those of the public school system that would be served by the school buses purchased with program funds; and

6. Support family-sustaining jobs in project construction by enforcing Davis-Bacon provisions, and utilizing project labor agreements (PLAs), community benefits agreements (CBAs), and local hire.

Administrative leadership in onshoring the electric vehicle supply chain is critical to securing an equitable and rapid transition for America’s electric school bus fleet.

Program implementation that incentivizes and rewards the manufacturing and purchase of union-made, domestically manufactured clean school buses will signal to manufacturers all along the clean school bus supply chain that it is worthwhile to establish facilities here in the United States, with good labor standards and safe and equitable work environments. The importance of a centralized, domestic supply chain base for critical manufactured goods became abundantly clear during the early months of the COVID-19 pandemic, when disruption of global supply chains constrained U.S. access to medical and safety equipment. Prioritization of Clean School Bus Program funds for facilities and projects that reinforce the domestic supply chain for clean school buses and infrastructure will work to circumvent this problem, securing good manufacturing jobs, and supporting the availability and affordability of clean school buses into the future.

Strong supply chains are largely localized supply chains.ⁱ This truism extends to clean school buses, charging infrastructure, and the parts that comprise them—from semiconductors and battery cells, to telematics and HVAC systems, to seats and seatbelts, to tires and composite bodies, to the critical components of charging infrastructure. It is essential that the vehicles and infrastructure that bring children to and from school are widely available, safe, and affordable. Parts and components must be easy to source and replace when they fail, and entire buses must be available and affordable to replace when they reach the end of their useful life.

Establishing a resilient domestic supply chain for clean school buses will be a key element of the program’s long-term success, and will directly contribute to the Administrator’s mandate to take into account “whether the funds will bring new technologies to scale or promote cost parity between old technologies and new technologies” (Considerations, Subpart (3)(D)). Moreover, as the Buy America provisions in the Bipartisan Infrastructure Law (BIL) come into effect and strengthen the Buy America requirements associated with federal investments, the positive market and employment effects of the Clean School Bus Program will be further magnified.

Electric school bus charging infrastructure should be installed and maintained to the highest standards of safety, which means employing EVITP-certified electricians for program-funded projects. For much of the public (particularly in rural areas where EV deployment may lag behind more urbanized regions), the deployment of electric school buses funded by the Clean School Bus Program will represent a first real-life experience with electric vehicles. Electric school buses will be a tangible proof-of-concept for electric vehicle technology more broadly. It is critical that the deployment of electric school buses is as smooth and safe as possible, and engenders widespread trust in the transformative potential of electric vehicles.

The Electric Vehicle Infrastructure Training Program (or EVITP) is a safety-first workforce training program designed by a wide range of stakeholders including labor unions, utilities, energy companies, developers, and charging companies, which is meant to prepare licensed electricians to safely install EV charging equipment. The installation of charging equipment in existing buildings (as will most frequently be the case for applicants to the Clean School Bus Program) is a particularly complex endeavor, as the power demands of bus chargers must be limited to the constraints of the building's electrical infrastructure or appropriate upgrades to the electrical infrastructure must be made. Poorly planned or inappropriately sized charging infrastructure represents a major fire hazard, with potentially catastrophic impacts at or near schools.

EVITP prepares licensed electricians to safely install and maintain the equipment through a highly affordable and widely available 20-hour course that is currently available online. Clean School Bus Program funds should be directed toward projects demonstrating the highest commitment to safety and reliability by prioritizing applicants using EVITP-certified electricians to install and maintain the electronic components of the charging equipment. EPA should also permit the use of grant funds to cover the cost of EVITP for contracted electricians.

EPA should codify robust workforce training conditions or guidance in its implementation of the Clean School Bus Program in order to support the incumbent workforce and facilitate investment in resilient and skilled bus drivers and mechanics. Through its guidance and implementation processes, EPA can protect workers and school bus riders by ensuring that school districts transitioning their bus fleets are providing holistic support to drivers and mechanics, who represent significant stakeholders in the transition and will be determinants of the program's success. In its implementation guidance, EPA should ensure that: High-quality training that results in industry recognized credentials is eligible for coverage by the grant funds; and

As a condition of receiving program funds, awardees provide current employees with training to effectively operate, maintain, or otherwise adapt to new technologies related to clean school buses.

Together, these provisions ensure that funding from the Clean School Bus Program serves to uplift and invest in the incumbent workforce, rather than displace and disrupt it. If implemented, they will support the positive impacts of the program's existing education and outreach program, which includes the provision of "... information regarding workforce development, training, and Registered Apprenticeships" to all grant program applicants. School districts need resources to implement robust training and workforce protections—not just information. Applying this guidance is one key way that EPA can support all of the workers who will make the transition to electric school buses possible.

Rigorous employment and job quality reporting guidance/requirements for awardees of program funds should be applied to ensure that the transition to clean school buses creates or retains good jobs for all impacted workers. The disbursement of Clean School Bus Program funds must not result in a reduction in number of jobs—or deterioration of job quality—for the workers who will make the transition to cleaner school buses possible. This includes the electricians who install the charging equipment, the mechanics who maintain the school buses, and the drivers who operate them. EPA can ensure that the transition to cleaner school buses protects workers by collecting metrics from applicants on expected and actual changes to job numbers, benefits, and job quality, to ensure that the EPA Administrator is informed of the impact of bus fleet transitions on workers. To the extent possible, the EPA Administrator should prioritize applications that demonstrate or project the greatest positive outcomes for all impacted workers.

Incentivize a strong and stable workforce by ensuring that program awardees classified as contractors or non-profit school transportation associations are held to the same or better labor standards as those of the public school system that would otherwise purchase the school buses. While further contracting/outsourcing should be limited to the utmost extent possible, the EPA Administrator should seek to ensure that awardees that are classified as contractors or non-profit school transportation associations do not flout regional standards of wages, benefits, and workplace safety. Pursuant to this objective, applicants falling under this category should be required in their application to provide the necessary employment metrics of the applicants' associated public school systems—or adjacent ones—as well as information on the wages and benefits offered to their contract workers in order to provide evidence that they are meeting or exceeding the area and industry labor standards.

Support family-sustaining jobs by enforcing Davis-Bacon provisions, and by utilizing PLAs, CBAs, and local hire. As EPA builds its guidance for Clean School Bus Program implementation, it should seek opportunities to ensure that the investments in EV charging and other infrastructure translate into good, union jobs and that the benefits of the transition to cleaner school buses accrue to the workers and the communities who need these benefits the most. This can be achieved through a range of provisions and practices. At minimum, EPA should enforce Davis-Bacon provisions, which ensure that all workers involved in installing and maintaining program-funded charging/fueling infrastructure are paid wages at least as high as those being offered in the surrounding area, ensuring that the workers who make the transition to cleaner school buses possible and safe are fairly compensated. EPA can exceed this minimum requirement by prioritizing funding for awardees that utilize PLAs, CBAs, and/or local hire—all of which can contribute to the protection of workers and communities by safeguarding existing labor agreements, uplifting workers' organizing rights like labor neutrality, majority sign-up, and first-contract arbitration, and addressing community needs for a given project.

Thank you for the opportunity to comment.

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End Note

ⁱ The Brookings Institution, “How to build more secure, resilient, next-gen U.S. supply chains,” December 2020. Available online: <https://www.brookings.edu/techstream/how-to-build-more-secure-resilient-next-gen-u-s-supply-chains/>.