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## NEW YORK ASSOCIATION FOR PUPIL TRANSPORTATION

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# NYAPT

*Our future is riding with us!*

May 13, 2022

Draft Scoping Plan Comments  
NYSERDA  
17 Columbia Circle  
Albany, NY 12203-6399

### Public Comment on Behalf of the New York Association for Pupil Transportation

My name is David Christopher, and I am the Executive Director of the New York Association for Pupil Transportation (NYAPT). NYAPT is a 501c6 trade association comprised of over seven hundred members who work in the school transportation industry across New York State, both in the public and private sectors. Our members are responsible for the safe and efficient transportation of 2.3 million school children in our state.

I am writing to provide comment on the New York Climate Leadership and Community Protection Act (CLCPA) Scoping Plan. The CLCPA will have a major impact on how our members deliver service to their communities and specifically to the children we are entrusted to transport safely and reliably each and every school day. We take our school transportation obligation very seriously, thus our interest in commenting on the CLCPA Scoping Plan.

Historically, the school transportation industry in New York has embraced efforts to improve emission standards for school buses. We have supported stricter emission standards for fossil fueled school buses powered by gasoline and diesel. Our members have piloted alternative fueled school buses to further improve and minimize vehicle emissions; examples being natural gas, propane, hybrid electric and electric powered buses. Our industry has practical experience piloting new technologies to clean and/or eliminate emissions coming out of the tailpipe of a school bus. We are well positioned to assist the State in advising and implementing an electric powered school bus transition.

We ask that our concerns be considered regarding the State's goal to transition to a zero-emissions school bus fleet. To be clear, we do not oppose the transition, we only seek to provide practical input on what steps are necessary from our perspective to make the transition successful.

First, the **lack of electric infrastructure** relative to the statewide power grid and at the local operational level are issues that must be resolved. It is our understanding that the state power grid will not support the electricity needs that a total conversion of the state's school bus fleet to electric would require. We further understand efforts are underway to upgrade the power grid and we support those efforts. **With that in mind, we ask that the power grid be upgraded in sufficient form to support an all-electric school bus fleet before the fossil fueled school bus ban takes effect in New York starting in 2035, or if not possible, that the requirement to purchase and operate only electric powered school buses be delayed beyond 2027 and 2035, respectively.** We ask this to uphold our commitment to our communities that we provide reliable service to our students each and every school day.

There are over seven hundred school districts in our state, many of which operate school bus fleets. There are also numerous private school bus operations located across New York. The scope of infrastructure improvements necessary to provide power for an all-electric school bus fleet at all locations is not known. Upgrades will be necessary in most bus garaging locations. Anecdotally, most of our members tell us their facilities will need significant upgrades to power an electric bus fleet.

Infrastructure improvement is a bigger problem than simply running cabling to a garaging facility. Many school bus garages in our state are severely outdated and cannot support an electric bus program at their garage facility due to space constraints, lack of garage equipment and insufficient electric power capacity. Many garages do not have sufficient parking space to house all buses in a centralized location along with electric charging equipment. Many operators “park out” their buses and sufficient power is not available at remote bus lot sites. Some operators rent space and installing electric charging stations and related infrastructure on rented properties is not practical. Lastly, lack of space in the large cities and Long Island presents challenges. **We recommend statewide site studies be initiated immediately to gather data on the scope and cost of upgrading the supporting infrastructure at each school bus operator site. Once the cost of improvements to accommodate an all-electric fleet are determined, financial incentives need to be provided to upgrade local garage site infrastructure.**

**We ask that sufficient financial incentives be provided to fund the purchase of electric buses by school districts and private operators.** Available federal and state incentives are much appreciated; however, they are not sufficient. For example, the \$500 million dollar funding proposed in the Environmental Bond Act to be voted on in the Fall of 2022 will pay for approximately 2,200 Type C school buses. There are over 47,000 school buses of varying sizes registered in New York State according to New York State Department of Transportation. This funding is far below the amount of funding necessary to convert the state bus fleet by 2035, the cutoff date for operating fossil fueled buses in our state. To add to the short fall of funding, we understand the \$500 million will be shared with the transit industry, thus increasing the shortfall of funding for school buses.

Electric advocates tell us that prices for electric buses will reach price parity with fossil fueled buses in the near future. We are concerned that price parity will not happen any time soon, if at all. According to a recent report in “New Power Progress” by Martin Daum, CEO of Daimler Truck dated March 28, 2022, cost parity of electric vehicles with fossil fueled vehicles is a long way off due to supply issues and increased manufacturing costs. Moreover, advertised reduced maintenance costs for electric buses that lower total cost of ownership projections when compared to diesel are not proven in the school bus application. Battery replacement, lower trade in values and the need to increase fleet size to offset dependability issues and battery range capability all must be factored in to total fleet costs. Financial rebates and grants to support this conversion to electric are necessary well into the future to make the transition affordable.

We are concerned that, without sufficient subsidies, a significant cost of transitioning to electric school buses will fall on the local taxpayer. This added local cost may force communities to make the choice of funding education or school bus fleets. In the past, when these kinds of choices have presented, school transportation has come up short.

Lack of funding will force schools to delay replacement schedules. Delayed bus replacement will impact the dependability of the state bus fleet and the safety of students who depend on those buses to travel to and from school. New York State Department of Transportation school bus inspection standards are the toughest in the nation. To pass rigorous inspections, bus fleets require regular maintenance and a reasonable bus replacement schedule. Buses retained beyond a reasonable useful life tend to fail NYSDOT inspections and are costly to maintain. As buses get more expensive, the tendency to retain them longer than reasonable will become the trend as school bus operators grapple with the significant increased cost of electric powered buses.

Students will be forced to find alternative forms of transportation to and from school if school districts roll back eligibility limits to save on school bus purchase costs. This is not good policy. Students are seventy times safer riding a school bus to and from school versus the private automobile according to the National Highway Traffic Safety Administration. The school bus provides children access to education, and we do not want to force changes that would fundamentally disrupt an industry that provides that access. **Again, we ask that appropriate funding be made available to school districts and private operators to replace fossil fueled buses with electric powered buses.**

Consider this alternative transition plan. Our industry is not convinced that a state policy that mandates an all-electric solution for school buses is in the best interest of the communities we serve. Electric buses are a good fit in many instances, and we support their use where practical. However, in some areas of our state and in some school districts, mandating the use of electric buses does not make sense. We have diverse needs across the state and electric buses do not fit all those needs. For instance, some school district bus routes are longer than current battery range technology can accommodate. Electric bus battery technology does not accommodate severe cold weather climates or the need for mandated air conditioning in the summer required by students that have special transportation needs. School districts provide transportation for extracurricular activities that often require travel for hundreds of miles across our state. Battery technology is not sufficiently advanced to provide the range of electric power required for extended bus trips. Re-charging at remote sites is not a solution as electric charging stations are not available statewide.

To respond to these concerns, we recommend a policy that incentivizes the use of electric buses where practical and makes allowances for near zero emission school buses to operate in those areas of the state where necessary. A policy that allows for near zero emission school buses to be deployed while electric or hydrogen technology develops would be the practical and logical path to transition to a zero-emission school bus fleet in our state.

Lastly, we are encouraged that industry stakeholders are invited to assist in the electric school bus transition process as authorized in the 2022-2023 New York state budget. Working with NYSERDA and the State Education Department provides the industry with the ability to provide input to policymakers on behalf of the industry. The school bus industry's concerns must be heard. School transportation is a unique industry and does not operate under the same parameters as the truck or transit industry. **We recommend that the CLCPA Scoping Panel solicit input from the school bus industry going forward to make this transition as seamless as possible. We stand ready to assist, as necessary.**

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Thank you for the opportunity to comment on the CLCPA Scoping Plan.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "David Christopher". The signature is written in a cursive, flowing style.

David Christopher  
Executive Director  
New York Association for Pupil Transportation