THE TRANSPORT PROJECT

400 North Capitol Street, N.W.
Suite 450
Washington, D.C. 20001
Transportproject.org

Daniel Gage
President
dgage@transportproject.org
202.824.7397 office/fax

April 6, 2025

The Honorable Lee Zeldon
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Electronic Submission

RE: Request for Information: Clean School Bus Program (26 CFR Parts 1 and 48), February 18, 2026 (EPA Docket: EPA-HQ-OAR-2025-1806REG-121244-23)

Dear Administrator Zeldon,

The Transport Project (TTP) is a national coalition of roughly 200 fleets, vehicle and engine manufacturers and dealers, servicers and suppliers, and fuel producers dedicated to the ongoing development of a growing, profitable, and sustainable marketplace for gaseous motor fuels, such as renewable natural gas (RNG), and related vehicle fleets.

In response to the U.S. Environmental Protection Agency's (EPA) Request for Information (RFI) as referenced above, TTP respectfully submits the following comments to address market availability of natural-gas powered school buses and related technologies, fuel supply, and the benefits that natural-gas buses deliver.

Market Availability of Low-Emission, Natural Gas-Powered School Buses

The Infrastructure Investment and Jobs Act of 2021 (the Act) provided a historic $5 billion for the EPA's Clean School Bus (CSB) Program from fiscal year (FY) 2022 to FY 2026 to support the replacement of existing diesel buses with low-emission (natural gas or propane powered) or zero-emission (hydrogen or electric powered) vehicles. The Act further stipulated that 50 percent of this funding was exclusively for zero-emission buses.

Unfortunately, the Act's mandate, coupled with the Biden administration's ambitious goal to electrify the U.S. transportation sector, spurred a significant market shift as consumers opted for highly incentivized electric vehicles over the low-emission, less subsidized vehicle options. Consequently, school bus manufacturers adjusted their product lines which had the greatest impact on natural-gas bus production. According to a 2025 industry study[1], natural gas vehicle registrations for school buses dropped significantly in 2024 with a reported decline of 54 percent

[1] TRC Companies, Inc. (TRC). "State of Sustainable Fleets 2025 Market Brief," April, 2025. Santa Monica, CA. Available at: https://www.staateofsustainablefleets.caom

over the prior year. This shift, while disappointing, was not a surprise given that the two leading school bus manufacturers in the U.S., Thomas Built Buses and Blue Bird, ended their production lines in 2023 and 2024 respectively.

Nevertheless, EPA should prioritize natural gas buses for funding under the CSB program. While TTP acknowledges that natural gas-powered school buses are not being manufactured currently, the engine technology still exists and simply requires recertification for production to resume. To that end, following the release of EPA's RFI, TTP members have begun actively exploring partnership opportunities to recertify these engines, engage with school districts currently operating diesel buses, and deliver new, cleaner natural gas buses to customers.

TTP also believes that EPA should consider funding retrofit technologies for Type C and Type D school buses that would convert existing in-service diesel vehicles to run on natural gas as part of a dual fuel system. This option would provide an interim solution for reducing nitrogen oxide (NOx) emissions without having to take working buses out of service and can be implemented for a substantially lower cost than a new electric bus and thus provide environmental benefits to a greater number of students.

RNG Transportation Fuel Production & Delivery

School bus fleet operators can draw upon abundant domestic energy resources and use the extensive natural gas pipeline network that spans the United States. This infrastructure supports reliable fuel delivery and reduces dependence on imported energy resources.

Presently, there are 505 RNG production facilities in operation, 153 under construction and an additional 293 in development in U.S. and Canada. During 2025, the RNG industry achieved historic growth, with 130 new operational facilities added to the North American RNG portfolio. This marks a second consecutive annual record-high for facility growth, after a then-record 114 facilities were added in 2024. This growth is propelled by development in food waste-RNG facilities, with technological development and landfill diversion programs taking root across North America.

Today, there are more than 1,600 public CNG/LNG fueling stations across North America. Operational CNG stations exist in 47 states plus the District of Columbia,[2] with many dispensing 100 percent RNG. Derived from biomass or other renewable resources, RNG use in transportation has increased 93 percent over the last five years. TTP estimates that 86 percent of all on-road fuel used in natural gas vehicles is RNG[3].

Nevertheless, fuel access continues to be a challenge for many school districts due to the high costs of infrastructure. Switching out diesel fleets with low-NOx vehicles requires a long-term commitment as buses are replaced over time and while commercial fueling stations might be available in some areas, a school district typically needs a dedicated refueling station for its fleet to be economically feasible. Moreover, even if the incremental cost of the vehicles

[2] The Transport Project (TTP). Q4 2025 NGV Refueling Infrastructure Report, December 2025. Available at: https://transportproject.org/2025/12/15/close-to-1400-natural-gas-stations-set-to-service-clean-transport-industry-in-2026/
[3] Coalition for Renewable Natural Gas and TTP. Drive Fleets Forward with RNG Fact Sheet. June 2025. https://transportproject.org/wp-content/uploads/2025/06/TP-RNG-Decarbonize-2024-rev-6-27.pdf

are fully funded through an incentive program, refueling infrastructure can cost $250,000 or more per station[4] (depending on the station capabilities and fleet needs).

For this reason, TTP strongly urges EPA to provide funding for natural gas infrastructure development along with school bus replacement to ensure that students in rural and underserved communities can benefit from a dedicated RNG fueling station. Doing so would signal support for transportation investments beyond electrification as a means of providing a cleaner future, which in turn could prompt renewable natural gas fuel producers and suppliers to expand their service areas and partner with school districts to help minimize their infrastructure costs.

Economic and Environmental Benefits of RNG-Fueled School Buses

According to the World Resources Institute (WRI), there are approximately 492,627 school buses operating in America today, of which only 2.9% are electric[5]. During program years 2022 and 2023, EPA awarded $2.6 of the $5 billion allocated for the Clean School Bus Program. Of this amount, less than seven percent went towards the purchase of low-NOx school buses with only one project awarded to fund a single natural school bus as part of a project that also included funding for an electric bus. Consequently, EPA managed to exceed the 50 percent electric vehicle funding mandate set by Congress; however, fewer diesel buses were replaced than could have otherwise been if funding for natural gas school buses was prioritized.

WRI notes that the national average purchase price for electronic buses[6] funded by the first round of EPA's Clean School Bus Program was $377,920 for Type C and $472,385 for Type D. According to EPA's data it awarded funding for 7,664 electric buses; however, using the same dollars to fund natural gas buses would have replaced far more diesel buses.

Compared with an estimated $165,000 for Type C natural gas bus, and $190,000 for Type D bus, EPA if it had used the full $2.6 billion to fund Type C natural gas or Type D buses could have replaced an additional 8,180 Type D buses or 8,878 Type C diesel buses and in total funded between 13,000 – 16,000 new school buses instead of the far fewer 7,664 electric buses. Likewise, if EPA had approved funding for the retrofit technologies with an estimated conversion cost of $12,500 per bus, a school district could have converted approximately 30 in-service Type C and 37 Type D diesel buses for the same cost as a single Type C and Type D electric bus, respectively.

If school bus fleets were to switch from diesel to CNG as a fuel source, communities would not only benefit from fuel cost savings, but air quality improvements as well. By prioritizing CSB funds to deploy natural gas buses EPA would offer the most cost-effective solution for reducing NOx emissions and thus deliver a healthier ride to and from school for a greater number of America's children.

---

[4] U.S. Department of Energy, Office of Energy Efficiency & Renewable Energy. Economic Analysis of Alternative Fuel School Buses. 2004. Available at: https://docs.nrel.gov/docs/fy04osti/35764.pdf
[5] World Resources Institute (WRI). Electronic School Bus Data Dashboard, March 9, 2026. Available at: https://electricschoolbusinitiative.org/electric-school-bus-data-dashboard
[6] World Resources Institute (WRI). Electronic School Bus Data Dashboard, March 9, 2026. Available at: https://electricschoolbusinitiative.org/electric-school-bus-data-dashboard

To illustrate the advantage of deploying natural gas school buses, TTP used the AFLEET Tool[7] to analyze the results of allocating $1 billion of the remaining Clean School Bus funds to deploy natural gas buses and the same amount to deploy electric buses. Two different comparisons were analyzed, one that assumed the entire portion of funding went to only Type C natural gas and electric buses, respectively, and the other that assumed the entire portion of the funding went to only Type D buses. In both cases, the number of natural gas buses deployed, and the total amount of pollution reduced is much greater than achieved by deploying electric buses.

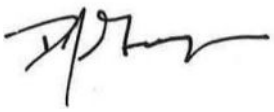
Evaluating Type C buses, TTP found that using $1 billion would result in 3,394 additional school buses and an additional reduction of 1.85 million pounds of NOx emissions. Evaluating the Type D buses, TTP found that using the $1 billion would result in 3,158 additional natural gas buses and an additional reduction of 1.73 million pounds of NOx emissions. In terms of cost, the Type C natural gas buses reduced NOx emissions at a cost of $290 per pound versus $627 per pound for electric buses. The Type D natural gas buses reduce NOx emissions at a cost of $334 per pound versus $794 per pound for electric buses.

TTP urges EPA to consider these costs and benefits when dispersing the remaining $2.4 billion in funding available under its CSB program. Doing so would ensure that the hard-earned American tax dollars used to fund this program are maximized to deliver environmental benefits to a greater number of students nationwide.

Conclusion

By prioritizing funding for natural gas-powered school buses, retrofit technologies and related infrastructure, EPA can ensure school districts have greater choice in replacing their in-service diesel buses. With a readily available, renewable fuel supply, these buses will provide a safe, reliable option for transporting students while also reducing NOx emissions from school bus fleets. And, compared to the cost of new electric school buses, prioritizing funding for natural gas buses would enable EPA to make American tax dollars go further, replace a greater number diesel buses, and thus achieve the primary objective of the Clean School Bus Program.

Sincerely,



Daniel Gage
President

[7] AFLEE Tool (accessed March 27, 2026); https://afleet.esia.anl.gov/afleet/total-cost-ownership-calculator. TTP used the AFLEET Tools default values for school bus miles and useful life. PA was selected as example state and the fuel source for natural gas was landfill gas since the majority of natural gas dispensed in the U.S. is now renewable natural gas. For the cost of buses TTP used the following: Type C NG $165,000, Type D NG $190,000, Type C electric $375,000, and Type D electric $490,000.