

Zero-Emissions School Bus Mandate

School leaders appreciate the goals of the transition to zero-emissions buses (ZEBs), and how this aspirational plan would assist the state in meeting its overall climate policy goals. However, with more than 700 districts being treated uniformly in one of the most socio-economically and geographically diverse states in the nation, the transition as currently proposed is not achievable. In order to comply, districts may be forced to reduce educational opportunities for students, increase taxes, and spend exorbitant sums.

Unlike consumer electric vehicles that have seen steep price declines, particularly in the last 12 months, ZEBs cost anywhere from two to upwards of four times more than traditional internal combustion engine buses (ICEs), and costs have not been going down as advocates had said they would during the 2022 budget deliberations. Additionally, the estimates for when the total cost of parity (TCOP) between ZEBs and ICEs would be achieved, according to advocates during budget deliberations, was 2027, spurring the 2027 purchase date codification. Since then, advocates have pushed back the TCOP date to 2030 and beyond. This reality is illustrated by California's mandate, which sets a date of 2035 for all new purchases to be zero-emissions (with five-year waivers), compared with our 2027 date; in addition, California has a much more agreeable climate to ZEBs, and a school bus fleet half the size of New York's. Additionally, optimism of future cost reduction in ZEB's may prove to be misplaced given the state mandate has eliminated incentives for manufacturers to lower costs given the lack of competitiveness in the sector.

In the short term, we offer the following suggestions in response to challenges we continue to hear from our members.

State-Funded District-Specific Fleet Implementation Plans Should Guide Each District

Currently, districts engage with utilities, third-party contractors, and others to analyze their routes, energy capacity, and fleets. Districts are given a route-by-route analysis, showing how much of a ZEB's charge would be left at the end of each route in favorable and unfavorable conditions.

This analysis, which takes into account the specific circumstances of each district, offers a nuanced and more realistic way to measure a district's transition feasibility, more so than a uniform artificial deadline created before the technology to support it is available.

NYSSBA, NYSCOSS, and ASBO-NY support a system wherein a uniform, state-supported route feasibility analysis guides each district's individual transition. There should be a threshold end-of-route charge requirement, such as 20%, that a ZEB would finish its route/routes, before charging is necessary, even in the worst conditions. That route would then be considered achievable, and part of the district's mandated transition. Timelines for a transition would then be individualized based on route feasibility. If the technology advances and costs are realistic, the legislature can review the statute again to determine if 100% ZEB's is attainable for all routes in all districts.

Require Certified Range Estimates from Manufacturers

Currently, the average range for zero-emissions buses, according to manufacturers, is approximately 125 to 200 miles. However, school transportation professionals as well as bus contractors supporting districts across the state have voiced concerns about actual on-the-road range once the bus is in their community. These concerns are based on the reality that the true range varies significantly based on weather, topography, speed, and driver skills. Manufacturers should only be permitted to sell ZEBs to schools after an independent entity has verified range estimates for each bus in different weather conditions with varying topography and traffic patterns.

State Coordination of the Transition

While it is crucial to ensure appropriate staffing levels to allow for review of capital project plans and grant applications, there are currently a web of agencies with at least partial authority over the transition. This leaves districts unsure who to engage with to reach the next stage of their transition, and receiving different answers from different stakeholders. There should be a centralized office for the ZEB transition for districts to engage with in a streamlined way. There should also be a clear statutory requirement that state regulated utilities must provide necessary grid capacity to school transportation facilities without the district being responsible for any share of these costs.

Apply State Grant Funding to the Local Share First

We strongly encourage changes to all current and future state-ZEB funding streams to cover the local share of purchase and project costs, before applying to the state share. This would match some of NYSERDA's successful program designs, such as the Clean Green Schools Initiative. By making this change, state support would go much further and make larger purchases economically feasible for districts.

Shorten the Aid Amortization Period to Seven Years for ZEB Purchases and Leases

For a standard ICE bus, the timeline for state aid to be amortized to the district is five years. However, the timeline for ZEBs was codified at twelve years in the 2022 enabling legislation. This is counterintuitive in terms of fleet management, given that zero-emissions buses are projected to have similar life spans as compared to diesel buses. While the engines are significantly less complicated, these bus frames and interiors are the same and those are the issues that often drive bus turnover.

Allow for Increased Transportation Storage Facility Costs to be Aidable

Finding or building locations to store the ZEBs is crucial to extend their range in colder weather. Additionally, there are costs associated with these storage facilities (such as higher power lifts due to increased weights, or equipment and software for advanced fire suppression systems) that are not present for ICEs. However, storage facility costs are currently not aidable with transportation or building aid. If districts were able to access aid at their state aid ratio, this would ensure an equitable distribution of state support to districts who need it to construct these facilities.

Regular Stakeholder Engagement

We appreciate the roundtable on the transition convened by the chairs of the Energy, Transportation, Education, and Science and Technology Assembly committees, and their invitation for our participation. We strongly encourage the regular convening of such stakeholder sessions to find ways to achieve progress and address the transition's barriers in real-time.

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