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Docket Operations
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: EPA-HQ-OA-2022-0859

Dear Docket Clerk:

The American Public Transportation Association (APTA) represents an $80 billion industry that directly employs 450,000 people and supports millions of private-sector jobs. We are pleased to offer comments regarding the Environmental Protection Agency's (EPA) Greenhouse Gas Reduction Fund; Request for Information (RFI) published on the Federal eRulemaking Portal on October 21, 2022.

Public Law 117-169, commonly known as the Inflation Reduction Act of 2022 (IRA), established a Greenhouse Gas Reduction Fund (GHGRF) and provided $27 billion to implement this new program. In designing the GHGRF, APTA urges EPA to ensure that public transportation entities and projects are eligible for GHGRF grants, loans, other financial assistance, and technical assistance. Using GHGRF funds for public transportation will directly contribute to achieving President Joseph Biden's climate goals, create good-paying jobs, and strengthen our nation's energy security.

Today, a typical trip on public transit emits 55 percent fewer greenhouse gas (GHG) emissions than driving alone. Across the country, public transit agencies are further reducing GHG emissions by integrating zero-emission vehicles into their fleets and setting goals for 100 percent zero-emission bus fleets in future years. According to the National Academies of Sciences, Engineering, and Medicine, an electric bus emits 62 percent fewer emissions than an average diesel bus. The GHGRF could directly benefit public transportation and help accelerate transit agencies' adoption of low-carbon and zero-emission fuels, equipment, and technologies, compounding transit's critical role in achieving our nation's climate goals.

GHGRF investments in public transportation projects would also improve the quality of life in low-income and disadvantaged communities, a key objective of the new program. Lower-income neighborhoods and communities of color experience higher particulate matter concentrations.[1] Communities of color make up a majority (60 percent) of public transit riders and a large percentage of riders are low-income.[2] Integrating zero-emission vehicles into public transportation fleets can notably improve air quality in disadvantaged communities with public transit service. Zero-emission buses have no tailpipe emissions, resulting in cleaner air for the neighborhoods in which they operate.

According to a 2021 National Academies of Sciences report, over the past 15 years, public transit agencies have consistently reduced their GHG emissions on both an overall and a per-passenger-mile basis.[3] Transit agencies have been early adopters of lower-carbon vehicle technologies and zero-emission vehicles to help meet ambitious climate action plan goals, which include GHG reduction set by state governments.[4] Moreover, in recent years, the GHG benefits of zero-emission buses have increased as more carbon-intensive grid electric power sources like coal have been replaced by renewable solar and wind. However, transit agencies continue to face some hurdles to adoption, including integrating charging and refueling infrastructure with existing public transit facilities and reconciling the range of current battery-electric buses with route operations.

Federal grants have been vital resources for public transit agencies nationwide in acquiring new zero-emission vehicles and related infrastructure. Public transit agencies need continued and increased federal support, through both grants and financing, to help implement their zero-emission transition plans and achieve zero-emission fleet goals. There are considerable costs to electrifying transit vehicle fleets, including charging infrastructure, maintenance facilities, personnel training, and the vehicles themselves. However, public transit providers remain committed to making these investments to reduce GHG emissions for all the communities that transit serves. Moreover, with GHGRF assistance, economies of scale may make it possible for public transportation to electrify and adopt clean power faster than the millions of individual drivers it would take to have the same impact on U.S. transportation emissions.

APTA submits more detailed comments below.

Section 3: Eligible Projects

APTA urges EPA to specifically designate public transportation projects as both eligible and qualified projects to receive funds from the GHGRF. As noted above, public transportation projects have a significant role in reducing GHG emissions in communities across the country.

[1] APTA Fact Sheet, Public Transit Leading in Transition to Clean Technology (2019).
[2] A total of 13 percent of U.S. households have incomes of less than $15,000, but among transit-using households, the comparable figure is 21 percent. For bus riders, that percentage increases to 30 percent. More than one-half (55 percent) of transit riders make less than $50,000. APTA, Who Rides Public Transportation Report (2017).
[3] National Academies of Sciences, Engineering, and Medicine, Transportation Research Board, Transit Cooperative Research Program (TCRP), An Update on Public Transportation's Impacts on Greenhouse Gas Emissions (TCRP Research Report 226) (2021) at 3.
[4] Center for Climate and Energy Solutions, U.S. State Climate Action Plans (accessed on November 23, 2022).

The National Academies found that, in 2018, public transportation in the United States saved 63 million metric tons of carbon dioxide equivalent (MMT CO2e)—equal to taking 16 coal power plants offline for a year.[5] Public transportation also helped avoid the use of 6.6 billion gallons of gasoline in 2018.[6] In addition, transit projects can have a multiplier effect because of land use efficiencies through shorter and fewer driving trips, and more trips on foot or by bicycle.[7] Communities with transit saved 131 billion miles of personal vehicle travel in 2018. The combination of transit vehicle GHG emissions, transportation efficiency GHG savings, and land use efficiency GHG savings produced a net 63 MMT CO2e of savings impact, equivalent to three percent of U.S. transportation GHG emissions.[8]

Section 4: Eligible Recipients

The IRA added a new section 134 to the Clean Air Act to establish the GHGRF.[9] Section 134(a)(1) makes available $7 billion for competitive grants to states, municipalities, and Tribal governments to deploy zero-emission technologies and for other GHG emission reduction activities. Many public transit agencies are public entities within municipal governments or political subdivisions of state governments. APTA urges EPA to ensure public transportation agencies are considered eligible entities for §134(a)(1) funding and indirect recipients for additional GHGRF funding. Allowing transit agencies to compete for such funding could have a substantial impact on reducing GHGs.

Section 5: Oversight and Reporting

APTA is a standards-setting organization that provides guidance to transit agencies by organizing hundreds of industry volunteers that help to develop standards for public transit agencies. APTA develops consensus-based documents that have a huge impact on the management and operations of transit organizations. In 2018, APTA issued a Recommended Practice to public transportation agencies for quantifying their greenhouse gas emissions, including emissions generated by transit and the potential reduction of emissions through efficiency and displacement.[10] The APTA Recommended Practice outlines a standard methodology for transit agencies to report their greenhouse gas emissions in a transparent, consistent, and cost-effective manner.

In its RFI, EPA requests comments on metrics and indicators that it should consider using to track relevant program outcomes, including but not limited to reductions in GHG or air pollution. APTA urges EPA to apply the standard calculation that APTA has recommended that transit agencies use to express net GHG emissions when measuring reduction benefits of transit projects. The net GHG emissions benefit accounts for emissions avoided from reductions in vehicle miles traveled and other mode shifts, as well as emissions generated by public transit agency activities to deliver service directly.

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[5] TCRP Research Report 226 at 15.
[6] *Id*. at 17.
[7] *Id.* at 15.
[8] *Id.* at 16.
[9] 42 U.S.C. § 7374.
[10] APTA Standards Development Program Recommended Practice, Quantifying Greenhouse Gas Emissions from Transit (APTA Recommended Practice) (2018).

Accordingly, APTA recommends the following calculation:

> *Net GHG Emission Benefit = Total GHG Emissions Avoided − GHG Emissions of Service Vehicles*

Section 6: General Comments

The IRA also included a new section 132 in the Clean Air Act,[11] providing $1 billion for a new Clean Heavy-Duty Vehicles grant program. States, municipalities, and Indian tribes are included as eligible recipients for the § 132 grant program. Many transit agencies are public entities within municipal governments or political subdivisions of state governments. APTA urges EPA to ensure public transit agencies are considered eligible recipients for § 132 funding to help further drive the conversion to zero-emission vehicle fleets at these agencies.

If you have any questions regarding this letter, please contact APTA's General Counsel, Linda Ford at lford@apta.com.

Sincerely,

Paul P. Skoutelas

Paul P. Skoutelas
President and CEO

[11] 42 U.S.C. § 7431.