RENEWABLE FUELS ASSOCIATION

Monday, April 6, 2026

U.S. Environmental Protection Agency
Transportation and Air Quality
1200 Pennsylvania Ave NW Washington, DC 20460
Docket ID: EPA–HQ–OAR–2025–1806

Re: Response to Request for Information – Clean School Bus Program (Section III: Alternative Fuels and Infrastructure)

Dear Administrator Zeldin and Agency Staff:

On behalf of the Renewable Fuels Association (RFA), thank you for the opportunity to comment on EPA's Request for Information regarding the Clean School Bus Program.

EPA's Development of Guidance for Alternative Fuel Vehicles and Fueling Infrastructure Deployment Under the Clean School Bus Funding Program request for comments appropriately focuses on real-world considerations of vehicle availability, fuel supply, infrastructure, cost, and program accountability. Evaluated against those criteria, ethanol stands out a viable near-term solution that is available today, affordable at scale, and capable of delivering immediate emissions reductions for clean school buses.

Flexible fuel vehicle (FFV) platforms can be widely deployed, and ethanol-capable technologies for medium- and heavy-duty applications are commercially available. Just as importantly, they are affordable. School districts can put significantly more ethanol-capable buses into service for the same level of federal investment than they can with battery-electric models.

Electric school buses remain constrained by high up-front capital costs, which are up to four times the cost of conventional alternatives even before factoring in infrastructure[1]. Over time, battery replacement costs add another layer of financial uncertainty that many school districts are simply not in a position to absorb. As an alternative to electrification (especially for smaller bus platforms), utilizing existing infrastructure, workforce talent, and existing ethanol fueling options would maximize the value of this program to the American taxpayer.

Ethanol is already the most widely used, lowest cost alternative fuel in the country. It is produced at scale, distributed through established infrastructure, and available today in virtually every market.

From a performance standpoint, ethanol delivers high octane, efficient combustion, and well-documented emissions benefits. Lifecycle greenhouse gas reductions of 40–50% or more (compared to

[1] US Dept of Energy Alternative Fuels Data Center

gasoline and diesel fuel) are common[2] [3], with even greater reductions achievable as production technologies continue to improve. This means ethanol fuels are ready to deliver benefits now and into the future.

EPA's request for comments asks what it actually takes to deploy infrastructure for refueling with clean fuels. In the case of ethanol, the answer is straightforward: very little. Existing fuel systems can typically be used with minimal mechanical and engine management software modifications. Prohibitions from the EPA's anti-tampering policy have previously excluded software modification. Augmenting or removing those prohibitions will allow retrofit kits from companies like eFlexFuel[4] and Advanced Fuel Dynamics to be installed in the existing fleet of gasoline-powered buses, while OEMs could be incentivized to offer flex fuel options for new acquisitions. This would reduce emissions and lower operational costs through the use of a cleaner fuel. Additionally, many school districts can rely on nearby retail fueling stations that offer E85. Roughly 7,000 retail sites in 45 states offer E85 today. Where new infrastructure is needed, it is relatively low-cost, available and quick to install, often without the second- and third-order effects of additional electrical power production and delivery infrastructure.

In contrast, electric charging infrastructure often requires significant capital investment, utility coordination, and in some cases grid upgrades that can take years to complete. These are not hypothetical concerns; they represent barriers already slowing deployment. Meanwhile, ethanol's supply chain is domestic, established, and scalable. It supports American agriculture, reduces reliance on imported energy, and is capable of meeting increased demand without disruption. Electric school buses may depend on global supply chains for batteries and critical minerals—supply chains that are constrained, volatile, and in many cases represent dollars flowing out of the American economy and into foreign sources. These realities introduce risk into procurement timelines and costs that the EPA should carefully consider.

RFA strongly supports EPA's focus on accountability and cost-effectiveness in the clean school bus program. A key part of that effort should be ensuring that emissions are evaluated on a full lifecycle basis.

Too often, electric vehicles are described as "zero-emission," but that characterization only reflects the absence of tailpipe emissions in the immediate vicinity of the vehicle. It does not account for emissions associated with electricity generation and mineral sourcing, which in many regions still rely heavily on fossil fuels. Additionally, serious questions have been raised about the labor practices (in other nations) associated with securing critical minerals needed for batteries. If the objective is to reduce real-world emissions while providing U.S. taxpayers with value, upstream impacts must be part of the analysis. Ethanol offers transparent and verifiable lifecycle emissions reductions that continue to improve over

[2] Dept of Energy - Life Cycle Emissions Assessments of Corn Ethanol Over Time
[3] Argonne National Labs – Retrospective analysis of the US Corn ethanol industry
[4] eFlexFuel Ford 7.3L Conversion Kit

time. A full lifecycle-based framework will ensure EPA is comparing technologies on a consistent and meaningful basis.

School transportation is not an abstract exercise or an optional expense that can be toyed with, it is a daily operational requirement for millions of children. Buses need to run on schedule, in all weather conditions, and across a wide range of route distances. Ethanol-fueled buses can meet those requirements today. They offer consistent range, fast refueling, and reliable performance regardless of season and regional climate. In contrast, electric buses face limitations related to range, cold weather performance, and charging time, which are particularly acute in rural areas, where distances are longer and infrastructure is more limited.

If the program is to serve all school districts, not just those in ideal conditions, EPA must ensure that practical, scalable options like ethanol are fully included.

The EPA's request for information is asking the right questions. When those questions are answered based on real-world data (availability, cost, infrastructure, supply chains, and lifecycle emissions), a natural conclusion is that Ethanol is one of the most effective tools available today to reduce emissions from the nation's school bus fleet.

If the goal is to deliver near-term emissions reductions, expand participation, and make the best use of taxpayer resources, ethanol must be part of the solution.

Thank you for your consideration of these comments. We look forward to continued engagement.

Respectfully submitted,

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