



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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JB PRITZKER, GOVERNOR

JOHN J. KIM, DIRECTOR

February 13, 2024

Certified Mail #7022 1670 0001 4381 7856  
Return Receipt Requested

Mr. Michael Bochanski, Jr.  
Wilmington Trust Company  
Volkswagen Diesel Emissions Environmental Mitigation Trust for State Beneficiaries, Puerto Rico, and  
the District of Columbia  
c/o Wilmington Trust, N.A. as Trustee  
Wilmington Trust, National Association  
Rodney Square North  
1100 North Market Street  
Attn: Capital Markets & Agency Services  
Wilmington, DE 19890

Re: State of Illinois Appendix D-4 Funding Request Numbers 13, 14, and 15  
Environmental Mitigation Trust Agreement for State Beneficiaries

Dear Mr. Bochanski:

As Lead Agency for the State of Illinois, enclosed please find the Illinois Environmental Protection Agency's (Agency) Appendix D-4 Funding Request Numbers 13, 14, and 15. As required by the Environmental Mitigation Trust Agreement, the Agency has electronically submitted the above-referenced funding requests through the Intralinks portal.

If you have any questions, please contact me at 217/782-7326 or via email at [julie.armitage@illinois.gov](mailto:julie.armitage@illinois.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Julie K. Armitage", written over a circular stamp or seal.

Julie K. Armitage  
Chief, Bureau of Air  
Illinois Environmental Protection Agency

Enclosures

**APPENDIX D-4**  
**Beneficiary Eligible Mitigation Action Certification**  
**FUNDING REQUEST #15**

**BENEFICIARY ELIGIBLE MITIGATION ACTION CERTIFICATION**Beneficiary: State of IllinoisLead Agency Authorized to Act on Behalf of the Beneficiary: Illinois Environmental Protection Agency (Illinois EPA)

<b>Action Title:</b>	Electric School Bus Replacements
<b>Beneficiary's Project ID:</b>	First Student – Chicago Public Schools: 2023-003 First Student – Indian Prairie SD 204: 2023-005 First Student – South Holland SD 151: 2023-007 First Student – Edwardsville CUD 7: 2023-008 First Student – Collinsville CUSD 10: 2023-009 First Student – Highland CUSD 5: 2023-010 First Student – Schaumburg CCSD 54: 2023-011 First Student – Burbank SD 111: 2023-012
<b>Funding Request No.:</b>	15
<b>Request Type:</b> (select one or more)	<input checked="" type="checkbox"/> Reimbursement <input type="checkbox"/> Advance <input type="checkbox"/> Other (specify): _____
<b>Payment to be made to:</b> (select one or more)	<input type="checkbox"/> Beneficiary <input checked="" type="checkbox"/> Other (specify): <u>First Student, Inc.</u>
<b>Funding Request &amp; Direction: (Attachment A)</b>	<input type="checkbox"/> Attached to this Certification <input checked="" type="checkbox"/> To be Provided Separately

**SUMMARY**

<b>Eligible Mitigation Action Action Type</b>	<input checked="" type="checkbox"/> Appendix D-2 item (specify): <u>2. Class 4-8 School Bus Replacement and Administrative Expenditures</u> <input type="checkbox"/> Item 10 – DERA Option (5.2.12) (specify and attach DERA Proposal)
<b>Explanation of how funding request fits into Beneficiary's Mitigation Plan (5.2.1):</b> Illinois' revised BMP submitted in April 2022 allocates up to 32 percent of its funds to replace older diesel school buses with new all-electric school buses and charging infrastructure and up to 2 percent for administrative costs (Section IV(D)).	
<b>Detailed Description of Mitigation Action Item Including Community and Air Quality Benefits (5.2.2):</b> This funding request involves the replacement of 14 older Class 7-8 diesel school buses from engine model years 2007-2009 with 14 new Class 7-8 all-electric school buses. The 14 new buses will operate in the Chicago and Metro-East nonattainment areas (Priority Areas 1 and 2 in Illinois' BMP).  The grant award was established at 75% of eligible costs for the electric school buses and any necessary charging equipment, up to a maximum award of \$250,000 for each bus. The total grant award for First Student is \$3,695,860 for buses and charging equipment that will serve the eight listed school districts. Replacing 14 older diesel buses from model years 2007-2009 with new electric school buses will result in reductions of NOx and other pollutants thereby providing air quality benefits to the area and the students served by the buses.	

<p><b>Estimate of Anticipated NOx Reductions (5.2.3):</b> It is anticipated that the project will result in 0.52 tons of annual NOx reductions.</p>
<p><b>Identification of Governmental Entity Responsible for Reviewing and Auditing Expenditures of Eligible Mitigation Action Funds to Ensure Compliance with Applicable Law (5.2.7.1):</b> Illinois EPA</p>
<p><b>Describe how the Beneficiary will make documentation publicly available (5.2.7.2)</b> The public may access documentation and records relative to the State of Illinois' administration of Trust Funds by submitting a request to the Illinois EPA pursuant to the Illinois Freedom of Information Act (5 ILCS 140/1, et. seq.). The Illinois EPA has regulations ("Access to Public Records of the Illinois Environmental Protection Agency," 2 Ill. Adm. Code Part 1828) that provide the framework by which Illinois EPA public records may be requested, accessed, inspected, duplicated, and further lists the records what will not be disclosed to the public, including records that contain personally-identifiable information and confidential business information. Trade secret and confidential business information claims are reviewed by the Illinois EPA in accordance with procedures and rules provided in 35 Ill. Adm. Code Part 130 and 2 Ill. Adm. Code Part 1828.</p> <p>The Illinois EPA will make certain documentation and records relative to its administrative of Trust Funds available on its Driving a Cleaner Illinois webpage. The Illinois EPA's Beneficiary Mitigation Plan ("BMP") was made available to the public for review and comment, and the final BMP is available through the Illinois EPA's Driving a Cleaner Illinois webpage. The Illinois EPA will make available funding opportunities and related information and documents through this webpage. Further, the Illinois EPA will maintain and make available for public review all documentation submitted in support of funding requests and all records supporting all expenditures of eligible mitigation action funds consistent with the aforementioned laws and regulations.</p>
<p><b>Describe any cost share requirement to be placed on each NOx source proposed to be mitigated (5.2.8):</b> Environmental Mitigation Trust Funds will provide 75% funding of eligible costs for the 14 new buses, up to a maximum of \$250,000 award for each, and for the necessary charging equipment. The applicants are required to provide a minimum 25% cost share, resulting in a minimum cost share amount of \$2,398,734.</p>
<p><b>Describe how the Beneficiary complied with subparagraph 4.2.8, related to notice to U.S. Government Agencies (5.2.9):</b> Illinois EPA provided the requisite notice via email to the appropriate agencies on February 27, 2018.</p>
<p><b>If applicable, describe how the mitigation action will mitigate the impacts of NOx emissions on communities that have historically borne a disproportionate share of the adverse impacts of such emissions (5.2.10):</b> The 14 new buses will operate in the Chicago and Metro-East nonattainment areas (Priority Areas 1 and 2 in Illinois' BMP) and will serve schools in each district that have a higher proportion of minority and low-income students. This project will reduce emission impacts in these two areas and to the communities and students served.</p>

**ATTACHMENTS**  
(CHECK BOX IF ATTACHED)

<input type="checkbox"/>	Attachment A	Funding Request and Direction.
<input checked="" type="checkbox"/>	Attachment B	Eligible Mitigation Action Management Plan Including Detailed Budget and Implementation and Expenditures Timeline (5.2.4).
<input checked="" type="checkbox"/>	Attachment C	Detailed Plan for Reporting on Eligible Mitigation Action Implementation (5.2.11).

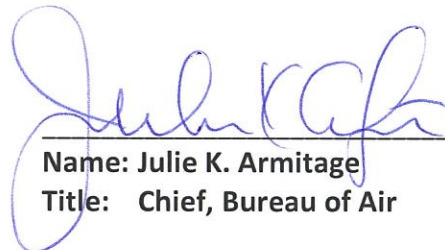
<input checked="" type="checkbox"/>	Attachment D	Detailed cost estimates from selected or potential vendors for each proposed expenditure exceeding \$25,000 (5.2.6). [Attach only if project involves vendor expenditures exceeding \$25,000.]
<input type="checkbox"/>	Attachment E	DERA Option (5.2.12). [Attach only if using DERA option.]
<input type="checkbox"/>	Attachment F	Attachment specifying amount of requested funding to be debited against each beneficiary's allocation (5.2.12). [Attach only if this is a joint application involving multiple beneficiaries.]

### CERTIFICATIONS

By submitting this application, the Lead Agency makes the following certifications:

1. This application is submitted on behalf of the Beneficiary State of Illinois, and the person executing this certification has authority to make this certification on behalf of the Lead Agency and Beneficiary, pursuant to the Certification for Beneficiary Status filed with the Court.
2. Beneficiary requests and directs that the Trustee make the payments described in this application and Attached A to this Form.
3. This application contains all information and certifications required by Paragraph 5.2 of the Trust Agreement, and the Trustee may rely on this application, Attachment A, and related certifications in making disbursements of trust funds for the aforementioned Project ID.
4. Any vendors were or will be selected in accordance with a jurisdiction's public contracting law as applicable. (5.2.5)
5. Beneficiary will maintain and make publicly available all documentation submitted in support of this funding request and all records supporting all expenditures of eligible mitigation action funds subject to applicable laws governing the publication of confidential business information and personally identifiable information. (5.2.7.2)

DATED: 2/13/24

  
 Name: Julie K. Armitage  
 Title: Chief, Bureau of Air

Illinois Environmental Protection Agency  
LEAD AGENCY

For

State of Illinois  
BENEFICIARY

## ATTACHMENT B

### Eligible Mitigation Action Management Plan Including Detailed Budget and Implementation and Expenditures Timeline (5.2.4)

#### Electric School Bus Replacements

Pursuant to Section 5.2.4 of the Environmental Mitigation Trust Agreement, the Illinois EPA provides the following Eligible Mitigation Action Management Plan. The milestone dates and yearly budget distributions provided are estimates and are subject to change based on the date of grant agreement execution and other variables.

#### Project Implementation Schedule and Milestones

Grantee: First Student, Inc.

Project ID: First Student – Chicago Public Schools: 2023-003  
First Student – Indian Prairie SD 204: 2023-005  
First Student – South Holland SD 151: 2023-007  
First Student – Edwardsville CUD 7: 2023-008  
First Student – Collinsville CUSD 10: 2023-009  
First Student – Highland CUSD 5: 2023-010  
First Student – Schaumburg CCSD 54: 2023-011  
First Student – Burbank SD 111: 2023-012

Period of Performance: March 2024 – October 2025

Milestone	Estimated Date
Illinois EPA enters into Grant Agreement	March 2024
Applicant enters into Purchase Agreement/Places Order	April 2024
Delivery of Vehicles from Vendor	June 2025
New Vehicles put into Service	August 2025
Existing Vehicles Scrapped	August 2025
Applicant provides detailed invoices for all claimed project costs and required final project certification documents to Illinois EPA to support direction to Trustee for Payment (Reimbursement, Direct-to-Vendor)	September 2025
Illinois EPA Completes Review and Certifies Payment Direction to Trustee (Reimbursement)	September 2025
Trustee Acknowledges Receipt of Direction for Payment(s) (Reimbursement)	October 2025
Illinois EPA submits Final Report for Project Completion	January 2026

## PROJECT BUDGET

### Electric School Bus Replacements

Budget Category	Total Approved Budget	Share of Total Budget to be Funded by the Trust	Cost-Share
14 New Electric School Buses and Charging Equipment	\$6,094,594.66	\$3,695,860	\$2,398,734.66
IEPA Administration @2%	\$73,917.20	\$73,917.20	
Project Totals	\$6,168,511.86	\$3,769,777.20	\$2,398,734.66
Percentage of Bus and Equipment Expenditure (not including 2% admin.)	100%	61%	39%

## PROJECTED TRUST ALLOCATIONS

Illinois' Allocation	\$108,679,676.98
Obligated Awards from Previous D-4 Submittals for Funding Requests #1-14 (Equipment + Administration Costs)	\$44,728,993.13
Illinois' Net Allocation	\$63,950,683.85
Current D-4 Project Funding Request (Funding Request #14 for 14 Electric Buses + Administration Costs)	\$3,769,777.20
Illinois' Remaining Unobligated Allocation	\$60,180,906.65

Funding Request #15: Anticipated Budget Year Distribution of Project Costs (Equipment + Admin.)	2024	2025 (14 Electric School Buses and Charging)	2026
1. Anticipated Annual Project and Administrative funding request to be paid through the Trust		\$3,769,777.20	
2. Anticipated Annual Cost Share		\$2,398,734.66	
3. Anticipated Total Project Funding by Year		\$6,168,511.86	

## ATTACHMENT C

### Detailed Plan for Reporting on Eligible Mitigation Action Implementation (5.2.11) Electric School Bus Replacements

Pursuant to Sections 5.2.11 and 5.3 of the Environmental Mitigation Trust Agreement, the Illinois EPA provides this project implementation reporting plan for the purchase of 14 new electric school buses and charging equipment by First Student, Inc. This detailed plan for reporting incorporates applicable State of Illinois grantee reporting requirements as well as Illinois' obligation to comply with the semi-annual reporting requirement contained in Section 5.3 of the Environmental Mitigation Trust Agreement. First Student will provide the reports as specified below to the Illinois EPA. Further, the Illinois EPA will provide semi-annual reports to the Volkswagen Trustee as specified below and as required based on the reporting information received from the grantees. The reporting deadlines contained herein are estimates and are subject to change based on the date of grant agreement execution and other variables.

**Grantee:** First Student, Inc.

**Project ID:** First Student – Chicago Public Schools: 2023-003  
First Student – Indian Prairie SD 204: 2023-005  
First Student – South Holland SD 151: 2023-007  
First Student – Edwardsville CUD 7: 2023-008  
First Student – Collinsville CUSD 10: 2023-009  
First Student – Highland CUSD 5: 2023-010  
First Student – Schaumburg CCSD 54: 2023-011  
First Student – Burbank SD 111: 2023-012

#### Reports and Reporting Schedule

Estimated execution of grant agreement and start of project:	March 2024
Due date of quarterly project report #1 from Grantee to Illinois EPA:	April 15, 2024 (January-March 2024)*
Due date of quarterly project report #2 from Grantee to Illinois EPA:	July 15, 2024 (April-June 2024)
Due date of semi-annual project report #1 from Illinois EPA to Trustee:	July 30, 2024 (January – June 2024)
Due date of quarterly project report #3 from Grantee to Illinois EPA:	October 15, 2024 (July-September 2024)
Due date of quarterly project report #4 from Grantee to Illinois EPA:	January 15, 2025 (October-December 2024)
Due date of semi-annual project report #2 from Illinois EPA to Trustee:	January 30, 2025 (July-December 2024)
Due date of quarterly project report #5 from Grantee to Illinois EPA:	April 15, 2025 (January-March 2025)
Due date of quarterly project report #6 from Grantee to Illinois EPA:	July 15, 2025 (April-June 2025)
Due date of final project report from Grantee to Illinois EPA:	September 30, 2025
Due date of final project report from Illinois EPA to Trustee:	January 30, 2026

*\*If grant agreement is executed in the January-March 2024 quarter*



### **Report Content**

Grantee and Illinois EPA reports will contain, at a minimum, the following information:

1. Summary of all costs expended through the reporting period and to date
2. Project status and development and implementation accomplishments
3. Any project modifications as compared to the original plan
4. Actual or projected project completion and grant termination date

## ATTACHMENT D

### Detailed Cost Estimates from Selected or Potential Vendors for each Proposed Expenditure Exceeding \$25,000 (5.2.6) Electric School Bus Replacements

Pursuant to Section 5.2.6 of the Environmental Mitigation Trust Agreement, Illinois EPA provides the following detailed cost estimates for the purchase of 14 new electric school buses by First Student, Inc.

Grantee: First Student, Inc.

Project ID: First Student – Chicago Public Schools: 2023-003  
First Student – Indian Prairie SD 204: 2023-005  
First Student – South Holland SD 151: 2023-007  
First Student – Edwardsville CUD 7: 2023-008  
First Student – Collinsville CUSD 10: 2023-009  
First Student – Highland CUSD 5: 2023-010  
First Student – Schaumburg CCSD 54: 2023-011  
First Student – Burbank SD 111: 2023-012

Equipment	Equipment Cost	Eligible Award Cost @75% or \$250,000 maximum per bus
14 MY 2024 Lion electric school buses	\$416,675 per bus \$5,833,450 for 14 buses	\$250,000 per bus \$3,500,000 for 14 buses
Charging Equipment	\$18,653 per unit \$261,144 for 14 units	\$13,989.75 per unit \$195,858 for 14 units
<b>TOTALS</b>	<b>\$6,094,594</b>	<b>\$3,695,860</b>

Trust Fund Request 14 Electric School Buses and Charging Equipment:	<b>\$3,695,860</b>
Trust Fund Request for Illinois EPA 2% Administrative Costs:	<b>\$73,917.20</b>
<b>Total Trust Fund Request for Funding Request #15:</b>	<b>\$3,769,777.20</b>