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Dear Senior Director Beiro-Réveillé:

I write on behalf of the Northeast States for Coordinated Air Use Management (NESCAUM) to request a hearing on the Environmental Impact Statement (EIS) prepared for the United States Postal Service (USPS) Next Generation Delivery Vehicle (NGDV) Acquisitions.<sup>1</sup> Based on our review of the EIS, the USPS would benefit from learning about our work with states on zero-emission vehicles (ZEVs) and pertinent information on technology capability and cost savings that would support a much higher percentage of ZEV deployment for the NGDV fleet than determined by the USPS.

As background, NESCAUM is the regional association of state air pollution control agencies in Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, and Vermont. NESCAUM serves as a technical and policy advisor to its member agencies on a wide range of air pollution and climate issues and facilitates multi-state initiatives to improve air quality and mitigate climate change. For more than three decades, NESCAUM and its members have closely collaborated with California and other states, EPA, and the automobile industry to promote low-emission vehicles and ZEVs. Through its Multi-State ZEV Task Force,<sup>2</sup> NESCAUM works collaboratively with states in the Northeast and across the country to drive ZEV adoption by exchanging ideas, developing consensus policy recommendations, and rapidly disseminating tested models.

Currently, NESCAUM is working with the Task Force to develop a *Medium- and Heavy-Duty ZEV Action Plan* as required by a Memorandum of Understanding (MOU) signed by a bipartisan coalition of 16 state governors and the mayor of the District of Columbia.<sup>3</sup> These jurisdictions are working together to promote opportunities and implement policies that will greatly reduce greenhouse gas emissions (GHGs) and harmful air pollution by accelerating the market for zero-

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<sup>1</sup> Environmental Impact Statement United States Postal Service, Next Generation Delivery Vehicle Acquisitions, December 2021 ([https://uspsngdveis.com/documents/USPS+NGDV+FEIS\\_Dec+2021.pdf](https://uspsngdveis.com/documents/USPS+NGDV+FEIS_Dec+2021.pdf)).

<sup>2</sup> Multi-State ZEV Task Force members include the states of California, Colorado, Connecticut, Hawaii, Maine, Maryland, Massachusetts, New Jersey, New York, North Carolina, Oregon, Pennsylvania, Rhode Island, Vermont, Virginia, and Washington; the District of Columbia; and the Canadian province of Québec.

<sup>3</sup> Multi-State Medium- and Heavy-Duty Zero Emission Vehicle Memorandum of Understanding (updated December 14, 2021); available at [https://www.nescaum.org/documents/mhdv-zev-mou\\_12-14-2021.pdf](https://www.nescaum.org/documents/mhdv-zev-mou_12-14-2021.pdf).

emission trucks, vans, and buses. To achieve a timely transition and ensure near-term progress, the MOU jurisdictions committed to strive to make 100 percent of sales of new medium- and heavy-duty vehicles ZEVs by no later than 2050, and at least 30 percent of sales by 2030.

Widespread electrification of medium- and heavy-duty vehicles is needed to avoid the worst effects of climate change and improve air quality and health outcomes, especially in frontline and overburdened communities near freight hubs, bus depots, and trucking corridors that are disproportionately impacted by emissions from diesel trucks and buses and more vulnerable to the effects of climate change. As one of the largest vehicle purchasers in the United States, the USPS has a tremendous opportunity to lead the way. By transitioning to ZEVs, the Postal Service fleet can provide significant public health and environmental benefits to communities across the country and advance environmental justice for frontline and overburdened communities, while also stimulating substantial economic growth and creating new employment opportunities.

The *Medium- and Heavy-Duty ZEV Action Plan* development process has garnered input from a diverse range of stakeholders, including truck and bus manufacturers, charging/fueling providers, utilities, environmental and community advocates, trucking industry and technology experts, public and private sector fleet representatives, and commercial financing experts. This broad input is helping to shape and refine the Action Plan's recommendations and inform the participating jurisdictions on a number of key issues, including off-the-shelf ZEV technology capabilities and the realistic potential cost savings in specific fleet applications. This information would be invaluable to the USPS in its decision-making process. For example, the EIS scenarios are bounded by 10 percent ZEV and 100 percent ZEV scenarios, with no clear consideration of other ZEV percentage scenarios in between the two bounds. Intermediate scenarios would be more informative of near-term cost and economic benefits by considering a greater share of ZEVs on local mail routes most amenable to current ZEV technologies.

Many of USPS's competitors have announced plans for significant ZEV purchases for their future fleets. This is because current ZEV technologies and their resultant total lower costs of ownership make sense to these companies in seeking or maintaining a competitive advantage over their rivals, including the USPS. These applications are well suited for electrification because many fleet vehicles serve predictable routes, travel less than one hundred miles per day, and return to a centralized depot, which enables fleets to strategically deploy vehicles and manage vehicle charging operations.

The jurisdictions working with NESCAUM on the *Medium- and Heavy-Duty ZEV Action Plan* are considering adopting a range of market-enabling policies to encourage the rapid deployment of electric truck fleets, such as regulatory sales and fleet purchase requirements, vehicle and infrastructure purchase incentives, electric utility programs and rate reform, and charging/fueling infrastructure planning and deployment. Several states already have legislative or other requirements to transition their agency and transit fleets to ZEVs, and may also consider adopting policies to promote or require third-party zero-emission shipping. Many local

jurisdictions are considering policies to provide ZEVs with special access to loading and unloading zones and dedicated road lanes in congested locations. At the same time, it is anticipated that federal and state emissions requirements for new and existing medium- and heavy-duty vehicles will continue to increase in stringency as the market transitions to ZEVs. Companies that recognize and embrace the transition-in-progress will be best situated to take advantage of the opportunities it presents.

NESCAUM and the states we work with would welcome an opportunity to provide additional information on technology readiness and the economic, public health, and environmental benefits of ZEVs that could serve the USPS fleet. To that end, NESCAUM requests that the USPS hold a hearing on its EIS to offer states and other interested stakeholders an opportunity to fully inform the USPS decision-making process. NESCAUM also requests that the USPS supplement its final EIS with additional relevant information and realistic alternatives that would transparently present all the assumptions and key data used in developing and assessing the alternatives.

We look forward to collaborating with the USPS on mutually beneficial measures that will maintain and enhance the services the USPS provides to its customers as well as provide a healthier and cleaner environment for all.

Sincerely,



Paul J. Miller

NESCAUM Executive Director

cc: NESCAUM Directors  
Brenda Mallory, Chair, White House CEQ  
Vicki Arroyo, U.S. EPA Associate Administrator for Policy