



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
POLICY

February 7, 2022

Ms. Jennifer Beiro-Réveillé, AIA
Senior Director, Environmental
Affairs and Corporate Sustainability
United States Postal Service
475 L'Enfant Plaza SW
Washington, D.C. 20260-6201

Dear Ms. Beiro-Réveillé:

In follow-up to the U.S. Environmental Protection Agency (EPA) letter dated February 2, 2022 providing comments on the United States Postal Service's (Postal Service) Final Environmental Impact Statement (EIS) for Next Generation Delivery Vehicle (NGDV) Acquisitions (CEQ Number 20220001), we provide the following corrections as an errata to our detailed comments.

- Page 8: The language highlighted below was inadvertently missing in discussion of tailpipe GHG emissions:
*The analysis dramatically underestimates the GHG emissions from the Postal Service's preferred ICE vehicles. The discrepancy between estimated ICE tailpipe emissions in the proposed action from the Postal Service's MOVES modeling and the emissions implied by its fuel consumption estimates, noted by EPA in our comments on the Draft EIS, **continues in the FEIS. The Postal Service's MOVES modeling estimates the tailpipe emissions from the ICE vehicles in its proposal to be 280,565 MTCO₂/yr,¹ while estimating separately that those vehicles' fuel consumption would be 109,770,855 gallons/yr.²** That amount of gasoline would emit 975,534 MTCO₂/yr when combusted,³ which is more than three times the value from the MOVES modeling. The lower emissions totals in the Postal Service's MOVES modeling imply a vehicle that achieves efficiency of 29.9 miles per gallon (mpg), when the Postal Service has determined that its vehicles will only achieve between 8.6 mpg (with air conditioning) and 14.7 mpg (without air conditioning).*
- Page 10: The following footnote on statutory requirements for Federal agency low-GHG-emitting vehicle acquisitions was broken and should refer to: "Energy Independence and Security Act of 2007, Subtitle C, Section 141 (f)(2)(a): ""Except a provided in subparagraph (B),

¹Final EIS Tables 4-6.1 and F-3.c.

²Final EIS Table G-2.

³ Using a standard emissions rate for gasoline of 8.887 kgCO₂/gal; see EPA Equivalencies Calculator for ease of use <https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator>

no Federal agency shall acquire a light duty motor vehicle or medium duty passenger vehicle that is not a low greenhouse gas emitting vehicle.”

- Page 11: The following footnotes were broken. Below are the complete references.
 - Footnote #13 on EPA plans should refer to “EPA’s Clean Trucks Plan, <https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P1012ON0.pdf>”
 - Footnote #14 on the multistate ZEV MOU should refer to: “<https://www.nescaum.org/documents/medium-and-heavy-duty-zero-emission-vehicles-action-plan-development-process/>”
 - Footnote #15 on the California regulations and letter should refer to: “Letter from California Air Resources Board to USPS dated January 28, 2022, and https://ww2.arb.ca.gov/sites/default/files/2021-08/210909acfdraft_highprioled_ADA.pdf”

We apologize for the inconvenience or confusion. For any questions or concerns, please contact Cindy Barger, Director of the NEPA Compliance Division at 202-564-3169 or by email at barger.cindy@epa.gov.

Sincerely,



Jennifer Macedonia
Deputy Associate Administrator

cc: Mr. Davon Collins
Environmental Counsel
United States Postal Service