



CREATING GOOD JOBS, A CLEAN ENVIRONMENT, AND A FAIR AND THRIVING ECONOMY

Davon Collins, Environmental Counsel
United States Postal Service
475 L'Enfant Plaza SW
Office 6606
Washington, DC 20260-6201

July 25, 2022

Response to United States Postal Service Notice of Intent to Prepare a Supplement to the Next Generation Delivery Vehicles Acquisitions Final Environmental Impact Statement

Dear Mr. Collins,

Thank you for the opportunity to comment on the United States Postal Service Notice of Intent to Prepare a Supplement to the Next Generation Delivery Vehicles Acquisitions Final Environmental Impact Statement.

The BlueGreen Alliance (BGA) unites labor unions and environmental organizations to solve today's environmental challenges in ways that create and maintain quality jobs and build a clean, prosperous, and equitable economy. BGA has been closely following the progress of the Postal Service's Next Generation Delivery Vehicles (NGDV) contract with Oshkosh Defense, given the contract's significant implications for the climate and for workers.

The NGDV contract represents an opportunity to rebuild the largest non-defense federal fleet to advance climate progress, improve air quality in our neighborhoods, support workers & their communities, and model responsible procurement practices. The turnover of the aging fleet can also restore the independent agency's financial stability in the long term through the significant total cost of ownership savings that come with electrification.

The Postal Service's recent announcement of its intention to increase the share of electric vehicles in its NGDV fleet demonstrates an improved commitment to using updated and pertinent data to make logical choices to build a modern Postal Service. BGA applauds this announcement. We hope to see continued growth in the EV share of the future fleet as the expected findings of the Supplemental Environmental Impact Statement demonstrate the significant environmental, health, and cost savings that could come with electrification.

Despite this positive development, however, there remain significant issues with the NGDV contract—namely its lack of consideration for the workers who will be building the vehicles and their components, and the communities where they are built. These issues are attributable to critical considerations missing from the Postal Service’s Final Environmental Impact Statement, namely:

1. The expected environmental and ecological impacts of building a manufacturing plant from the ground up on a former warehouse site in South Carolina, as compared to assembling the NGDV fleet in an existing or expanded facility in Wisconsin;
2. The expected socioeconomic impacts on workers and communities resulting from the planned placement of the NGDV fleet manufacturing facility in South Carolina, where Oshkosh Defense employees will not fall under the longstanding collective bargaining agreement between the United Auto Workers (UAW) and Oshkosh Defense in all its Wisconsin facilities; and
3. The expected socioeconomic benefits that may accrue to workers and communities through successful development of a resilient domestic supply chain for a NGDV fleet built with U.S.-made components, which include but are not limited to batteries, glass, steel, tires, and lights.

These considerations will significantly impact the Postal Service and the public’s understanding of how the environmental and socioeconomic benefits of the NGDV contract are distributed. They should be incorporated into the Supplementary Environmental Impact Statement.

Thank you,

Reem Rayef
Policy Advisor
BlueGreen Alliance
1020 19th Street NW
Suite 700
Washington, DC 20036