



October 12, 2021

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

RE: Notice of Availability of Draft Environmental Impact Statement for Purchase of Next Generation Delivery Vehicles

Dear Mr. Collins,

On behalf of the Fuel Cell and Hydrogen Energy Association (FCHEA), we appreciate the opportunity to provide comment on the U.S. Postal Service's (USPS) Draft Environmental Impact Statement for Purchase of Next Generation Delivery Vehicles.

FCHEA is the national trade association representing more than 65 leading companies and organizations that are advancing innovative, clean, safe, and reliable energy technologies. FCHEA's members represent the full global supply chain of the fuel cell and hydrogen industry including automakers, aerospace, industrial gas suppliers, fuel cell and electrolyzer stack and system manufacturers, component suppliers, utilities, and more. Collectively, our members are located across the country and employ hundreds of thousands of people.

Fuel cell technologies and hydrogen energy are being increasingly viewed as essential decarbonization options across the United States and around the world for a wide range of sectors, including transportation of goods and people. Fuel cell electric vehicles use fuel cells to generate electricity onboard through an electrochemical reaction of hydrogen, not combustion. These light-duty zero-emission vehicles are capable of traveling 300 to 400 miles on a tank of fuel, with refueling in just three to five minutes. Fuel cell electric vehicle transportation is showing great promise for the medium-duty and delivery van market in particular due to their long-range, fast refueling, and scalability – allowing for smooth operations for fleets using an efficient centralized fueling capability.

In just the last few years, there has been much commercial development in fuel cell transportation and hydrogen fueling. Today, there are over 10,000 light-duty fuel cell electric consumer vehicles on the road in California, accompanied by dozens of fuel cell electric buses in revenue service, tens of thousands of fuel cell-powered forklifts in operation across the country, and a growing deployment of medium- and heavy-duty vehicles for long-haul transport and delivery services, including customers like DHL, UPS, and FedEx. In fact, the USPS currently has a fleet of fuel cell material handling equipment in operation at its Washington National Distribution Center in southern Maryland.

There are a wide range of fuel cell manufacturers and automakers advancing activities in this space, including General Motors, Toyota, Hyundai, Plug Power, Cummins, Ballard Power, Nikola Motors, and many more. Many FCEA members are also focused on building out the hydrogen production and fueling ecosystem that will result in publicly accessible hydrogen fueling networks across the country supporting not just light-duty consumer vehicles, but also fleets of medium-and heavy-duty FCEVs.

Hydrogen transportation also has great potential for emissions reduction. On a well-to-wheels basis, no matter the source of hydrogen, fuel cell electric vehicles dramatically reduce CO₂ emissions by at least 50% compared to combustion vehicles and are on par or better than reductions with battery electric vehicles (BEVs). When hydrogen is generated from renewable or low-carbon sources – such as wind, solar, biomethane, or natural gas with carbon capture and sequestration – carbon emissions are greatly reduced or can be eliminated entirely. Medium- and heavy-duty vehicles are especially important from an environmental justice standpoint, helping to reduce emissions, improve local air quality, and protect public health on congested highway routes and from industrial warehouses for the last-mile delivery market.

A recent report by McKinsey and Company, [Road Map to a US Hydrogen Economy](#), found that the hydrogen sector has tremendous potential to bolster the US economy through the creation of investment opportunities and skilled energy jobs, while providing significant reductions in emissions. The report finds that by 2050, the hydrogen sector could provide 16% reductions of CO₂ emissions, 36% reduction in NO_x emissions, and account for 14% of US energy demand.

We understand that the USPS has already provided a contract for the development of next generation delivery vehicles that will include both internal combustion engine (ICE) and BEV drivetrain options. We request that FCEVs and adaptation of fuel cell drivetrains be considered for this environmental impact assessment, as well as in this or future procurement and project demonstration efforts by the USPS. We believe that fuel cell transportation is well-aligned for the USPS in both meeting its delivery and service needs, as well as providing the environmental benefits that are sought by the agency.

We would like to offer a briefing for you and your leadership with our top member executives operating in this space to elaborate on these points further. We look forward to greater coordination and collaboration between our industry and the Postal Service. Should you wish to contact me in the meantime, I can be reached by email at fwolak@fchea.org or by phone at (202) 261-1333.

Sincerely,



Frank Wolak
President & CEO
Fuel Cell and Hydrogen Energy Association

The following organizations have signed on in support of this letter:

California Hydrogen Business Council



Colorado Hydrogen Network



The National Fuel Cell Research Center



Renewable Hydrogen Alliance

