



May 2, 2021

Stephanie Pollack, Acting Administrator
Federal Highway Administration
U.S. Department of Transportation
1200 New Jersey Avenue S.E.
Washington, DC 20590



311 Conf. Center Building
Knoxville, TN
37996-4134

865.974.9665
865.974.1838 fax
info@etcleanfuels.org
www.TNCleanFuels.org



*ETCleanFuels has been a
designated U.S. DOE Clean Cities
Program member since 2004.*

**Re: Docket No. FHWA-2020-0001; NATIONAL STANDARDS FOR TRAFFIC CONTROL DEVICES; THE
MANUAL ON UNIFORM TRAFFIC CONTROL DEVICES FOR STREETS AND HIGHWAYS; REVISION**

Dear Acting Administrator Pollack:

We are concerned that changes FHWA has proposed to the MUTCD do not reflect the intent of Congress or the goals of the Alternative Fuels Corridor program the FHWA previously published in the federal register. We feel strongly that federal rules should create parity between signage rules for gasoline fueling stations and alternative fueling stations.

As you may know, Congress established an Alternative Fuels Corridor program through Section 1413 of the FAST Act.ⁱ According to the text of the law, Congress created the corridor program “to improve the mobility of passenger and commercial vehicles that employ electric, hydrogen fuel cell, propane, and natural gas fueling technologies.” In 2016, FHWA published goals of the alternative fuel corridor program in the federal register, including: to ‘promote the build out of a national network,’ to ‘develop national signage and branding to help catalyze applicant and public interest,’ to ‘promote and advance alternative fuel corridor designations.’ Further, the agency noted that ‘alternative fuel corridors with support for lower-emitting vehicles can assist in the effort towards ‘achieving reductions in [greenhouse gas] emissions...from transportation sources.’ⁱⁱ

We are including below a summary of our recommendations as well as a summary of changes proposed by your agency staff. We hope your office will conduct a serious review of this pending policy decision prior to the May 14, 2021 deadline and revise the MUTCD to create signage parity for alternative fuel stations.

Diamond & Platinum Partners:



RECOMMENDED CHANGES TO THE FHWA PROPOSAL:

- Change the word GAS to FUEL and define GAS and FUEL in the manual to include alternative fuels. These terms should be defined to include at least the fuels Congress included in the FHWA Alternative Fuels Corridor Program (electric, hydrogen fuel cell, propane, natural gas) under 23 U.S.C. 151. Precedent for this recommendation already exists as some states have already changed GAS to FUEL in their own version of the manual.
- States should have the flexibility to use either General Service or Specific Service signs for alternative fuel stations. If a state desires to incorporate alternative fueling stations into their existing logo programs, they should not be prohibited from doing so by FHWA. States that wish to incorporate alternative fueling station signage into their program using General Service signs should also have this option.
- Businesses with logo panels in categories other than GAS should be permitted to include a supplemental message indicating the availability of an alternative fuel at their location. For example, a coffee shop should not be prohibited from including a supplemental

- message on their Specific Service sign panel indicating the availability of electric vehicle charging at their location.
- States should be permitted to use the Alternative Fuels Corridor identification sign as a way of notifying road users that they are on an existing corridor without a requirement to also utilize General Service and/or Specific Service signs.

UNACCEPTABLE CHANGES FHWA HAS PROPOSED TO THE MUTCD:

- Alternative Fuel stations will be prohibited from using Specific Service signs unless they are also a gasoline station. *The only transportation fueling station permitted to display their logo on a highway sign will be a gasoline station.*
- Alternative fuels can only be listed on specific service signs as a supplemental message along the bottom of a gasoline station logo sign panel. *For example, a gasoline station could indicate on their GAS sign logo they have propane autogas or electric vehicle charging available, but a standalone, non-gasoline vehicle fueling station has no way to include their logo on a sign.*
- Categories of businesses other than gasoline stations with logo signs (FOOD, LODGING, ATTRACTION) will be prohibited from including a supplemental message indicating they offer an alternative fuel. *For example, a coffee shop will be prohibited from adding a supplemental message on the FOOD sign indicating they have EV charging available at their location. Likewise, a hotel would be unable to indicate on the bottom of their sign they offer EV charging.*
- Signing for alternative fueling stations will only be permitted using General Service signs. *This is against the wishes of many states that would prefer to sign for alternative fueling stations using Specific Service signs.*
- It is understandable that the FHWA proposal designates that Alternative Fuels Corridor sign(s) shall only be installed on highways officially designated as Alternative Fuel Corridors. *States should not, however, be prohibited from using the Alternative Fuels Corridor sign for the sole purpose of raising corridor awareness in a manner consistent with what FHWA published in the federal register in 2016 under the administration of President Barack Obama.ⁱⁱⁱ*

We appreciate your service to our country and stand ready to assist you to achieve our mutual goals.

Sincerely,



Jonathan G. Overly
Executive Director, East TN Clean Fuels Coalition
jonathan@etcleanfuels.org, 865-974-3625



Daniel J. F. Siksay
Co-Coordinator, East TN Clean Fuels Coalition
daniel@etcleanfuels.org, 865-309-6657

ⁱ <https://www.congress.gov/bill/114th-congress/house-bill/22/text/enr>

ⁱⁱ <https://www.govinfo.gov/content/pkg/FR-2016-07-22/pdf/FR-2016-07-22.pdf>

ⁱⁱⁱ <https://www.govinfo.gov/content/pkg/FR-2016-07-22/pdf/FR-2016-07-22.pdf>