

May 14, 2021

Interstate 35 Alternative Fuel Corridor Coalition

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

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 Ms. Pollack:

We are writing to you as the Interstate 35 (I-35) Alternative Fuel Corridor (AFC) Coalition which is an interstate group of U.S. DOE Clean Cities Coordinators, state department of transportation representatives, and other individuals and organizations supporting alternative fuel corridors. We hope you will review the **pending** decisions your agency made during the previous administration to change the FHWA's Manual on Uniform Traffic Control Devices (MUTCD) to severely limit alternative fueling station roadway signage eligibility. We highlighted below why alternative fueling stations, including electric vehicle (EV) charging, should have parity with petroleum stations when it comes to signage.

- 1. Meets the demands of the current and future transportation market:** Gasoline and diesel fuels once dominated (monopolized) the transportation market; however, with growing adoption of EVs and other alternative fuel vehicles (AFVs), that is no longer the case in today's America. There are currently 34,857 non-gasoline fueling stations open to the public,¹ and alternative fuel corridor designations cover approximately 165,722 miles of the National Highway System.² The fuel mix in the U.S. is more diverse than ever and will continue to diversify at an increasingly rapid pace. The attached graph shows that by 2050, nearly 54 million light-duty AFVs will be driving on U.S. roads.³ Including alternative fuels in the MUTCD is imperative to meeting the demands of consumers both now and in the future.
- 2. Supports local businesses and increases regional fuel sourcing:** There is not an issue with drivers of gasoline vehicles being confused about where to find fuel; the opposite is true. Gas is widely available, and signage is more important for drivers of AFVs. Robust support in the manual for alternative fuels will help businesses, specifically convenience store and travel center operators, meet their customers' evolving needs and expand the fuel infrastructure in the U.S. Continuing to increase our use of domestically produced fuels is a crucial step the government can take to provide our country additional environmental, energy, and economic security.
- 3. Helps address driver safety issues:** According to the MUTCD website, "Traffic control devices (TCDs) are very critical for the safe and efficient transportation of people and goods." The website also states, "The use of uniform TCDs (messages, locations, sizes, shapes, and colors) helps reduce crashes and congestion, and improves the efficiency of the surface transportation system ... The MUTCD is a dynamic document that changes with time to address contemporary safety and operational issues."⁴

¹ https://www.fhwa.dot.gov/environment/alternative_fuel_corridors/

² <https://afdc.energy.gov/stations/#/find/nearest?country=US>

³ U.S. Energy Information Association (EIA) Annual Energy Outlook 2021.

⁴ <https://mutcd.fhwa.dot.gov/kno-overview.htm>

The proposed revisions not only ignore the evolving transportation market but encourage drivers to use their phones to locate alternative fueling stations. Researchers consistently link texting or manipulating a cellphone to increased crash risk, and as of October 2020, twenty-five states, D.C., Puerto Rico, Guam, and the U.S. Virgin Islands prohibit all drivers from using hand-held cellphones while driving.⁵ Robust support in the manual for alternative fuel signage will help address contemporary safety and operational issues faced by AFV drivers.

4. **Aligns with the goals of the Alternative Fuels Corridor program:** Our views are consistent with the purpose stated in the law establishing the Alternative Fuels Corridor program through Section 1413 of the FAST Act.⁶ 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 this sense, we understand the term ‘mobility’ to be referring to the need to expand motorist ‘access’ to the fuels in order to be able to move freely and to increase transportation options for motorists. The proposed MUTCD changes are counter to these goals.
5. **Aligns with statements made by the FHWA:** We strongly agree with previous FHWA statements that our country needs to “adopt innovative and collaborative approaches” to “bend the curve on transportation greenhouse gas emissions, which continue to be the largest and fastest growing source of climate-altering pollution.”⁷ The FHWA published goals for the Alternative Fuel Corridor program in the federal register in 2016 and include, “promote the build out of a national network,” “develop national signage and branding to help catalyze applicant and public interest,” and “promote and advance alternative fuel corridor designations,” because “alternative fuel corridors with support for lower-emitting vehicles can assist in [the] effort towards achieving reductions in greenhouse gas emissions from transportation sources.”⁸ Again, the proposed MUTCD changes are counter to the FHWA’s previous statements and the goals of the Alternative Fuel Corridor program.

Below is 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 publish an updated MUTCD that looks toward the future of transportation which includes a growing number of vehicles powered by cleaner, alternative fuels.

RECOMMENDED CHANGES TO THE FHWA PROPOSAL:

- **Change the word GAS to FUEL and/or define GAS and FUEL in the manual to include alternative fuels.** At a minimum, these terms should be defined to include the fuels Congress included in the FHWA Alternative Fuels Corridor Program (electric, hydrogen fuel cell, propane, natural gas) under 23 U.S.C. 151 and would ideally also include biodiesel and ethanol, which can be used in diesel and gasoline vehicles. Precedent for this recommendation already exists, as some states have changed GAS to FUEL in their own versions of the manual.
- **Give states the flexibility to use either General Service or Specific Service signs for alternative fueling stations.** If a state desires to incorporate alternative fueling stations into its existing logo programs, it

⁵ <https://www.ncsl.org/research/transportation/cellular-phone-use-and-texting-while-driving-laws.aspx>

⁶ <https://www.congress.gov/bill/114th-congress/house-bill/22/text/enr>

⁷ <https://www.transportationandclimate.org/statements-state-leaders-launch-tci-p>

⁸ <https://www.federalregister.gov/documents/2016/07/22/2016-17132/fixing-americas-surface-transportation-act-designation-of-alternative-fuel-corridors>

should not be prohibited from doing so by the FHWA. States that wish to incorporate alternative fueling station signage into their program using General Service signs should also have the option to do so.

- **Allow businesses with logo panels in categories other than GAS 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.

UNACCEPTABLE CHANGES PROPOSED BY THE FHWA TO THE MUTCD:

- **Change proposed by the FHWA:** “Alternative fuel stations will be prohibited from using Specific Service signs unless they are also a gasoline station.” **Impact:** *The only transportation fueling station permitted to display their logo on a highway sign will be a gasoline station, with potential safety impacts from drivers using mobile devices as an alternative to roadway signage.*
- **Change proposed by the FHWA:** “Alternative fuels can only be listed on specific service signs as a supplemental message along the bottom of a gasoline station logo sign panel.” **Impact:** *For example, a gasoline station could indicate on their GAS sign logo they have propane Autogas or EV charging available but a standalone, non-gasoline vehicle fueling station has no way to include their logo on a sign. See additional safety impacts above.*
- **Change proposed by the FHWA:** “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.” **Impact:** *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.*
- **Change proposed by the FHWA:** “Signing for alternative fueling stations will only be permitted using General Service signs.” **Impact:** *This proposal goes against the wishes of many states that would prefer to sign for alternative fueling stations using Specific Service signs.*
- **Change proposed by the FHWA:** “Understandably, the FHWA proposal designates that Alternative Fuels Corridor sign(s) shall only be installed on highways officially designated as Alternative Fuel Corridors.” **Impact:** *States will not be allowed 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 a General Service and/or Specific Service sign. This is inconsistent with what the FHWA published in the federal register in 2016 under the administration of President Barack Obama.⁹ See also safety impacts above.*

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

Sincerely,

Kelly Gilbert, Executive Director

[Metropolitan Energy Center](#)

Tami Alexander, Coordinator

[Central Kansas Clean Cities Coalition](#)

Kansas & the Greater Kansas City Metro Businesses

[Clean Energy Business Council](#)

Dorothy Barnett, Executive Director

[Climate + Energy Project](#)

MK Anderson, Coordinator

[Iowa Clean Cities Coalition](#)

Brandt Hertenstein, Coordinator

[Kansas City Regional Clean Cities Coalition](#)

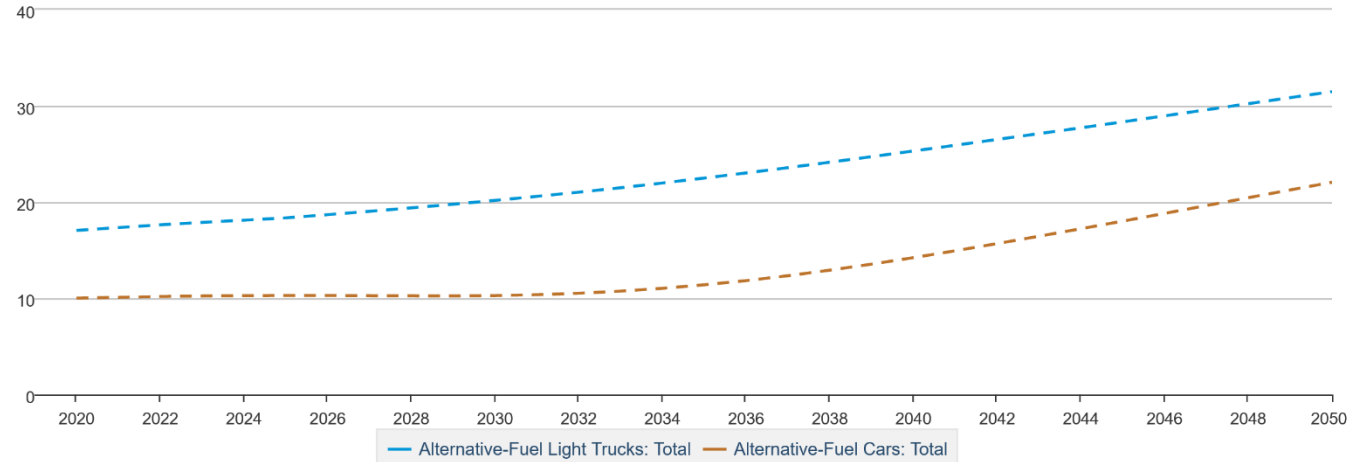
⁹ <https://www.govinfo.gov/content/pkg/FR-2016-07-22/pdf/FR-2016-07-22.pdf>

Light-Duty Vehicle Stock

Case: Reference case

 DOWNLOAD

millions



Source: U.S. Energy Information Administration

CHART INDEXING OPTIONS: **None** Index to Start as Percent Index to Start as Value