



Oregon

Kate Brown, Governor

Department of Transportation

Climate Office

555 13th Street NE

Salem, OR 97301-4179

Phone: (503) 986-3300

Fax: (503) 986-4189

May 10, 2021

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 HIGHWAY*; REVISION – EV SIGNAGE (CHAPTER J)

Dear Ms. Pollack,

Adequate electric vehicle (EV) signage is critical to enabling transportation electrification in Oregon and elsewhere. EV signs help users navigate to refueling/recharging sites and help gain public confidence that frequent charging exists and therefore is a viable way to travel. The new revisions to the MUTCD (Manual on Uniform Traffic Control Devices) restrict sign placement and messaging in ways that are likely to hinder state and national transportation electrification goals. Specifically, the revisions would: (i) prohibit most EV charging facilities from qualifying for placement on Specific Service signs; and (ii) limit the use of supplemental word messages about EV charging stations to gas station businesses only. Both of these factors would severely limit Oregon and other states' flexibility to install highway signs for EV charging.

It is critical that states have the flexibility to sign for charging stations close to our roadways in a way that ensures the safety and convenience of EV drivers as well as guarantees EV charging providers parity with gasoline stations. As such, the Oregon Department of Transportation (ODOT), in conjunction with the Oregon Travel Information Council (TIC), the Oregon Department of Environmental Quality (DEQ) and the Oregon Department of Energy (ODOE), request that you modify the MUTCD as outlined below.

Do not prohibit EV charging facilities from Specific Service signs:

The FHWA is proposing to rely on General Service signs, rather than Specific Service signs in most instances, to guide EV drivers to charging facilities. Specific Service signs would no longer be available to alert drivers to EV charging, unless the EV charging is co-located at a gasoline service station.

EVs are expected to make up a significant portion of vehicles on the road in the coming years, when this upcoming edition of the MUTCD will likely still be in effect. As a result, this revision would inconvenience a growing number of motorists who drive EVs and need to refuel their vehicles at charging stations instead of gasoline pumps. Drivers of both EVs and gasoline powered cars need to be informed about the fueling services available to them near highway exits.

Utilizing only General Service signs to guide EV drivers is not adequate for ensuring the safety and convenience of EV drivers. General Service signs make use of a generic symbol to direct drivers to EV charging stations, therefore omitting information that is important to EV drivers such as the type and name of the facility and the charging station provider. As such, EV drivers will have difficulty locating charging stations, especially at exits with multiple businesses, and have no way of determining charging compatibility in advance.

With EV signage relegated to General Service signs only, EV drivers will be forced to resort to GPS-based phone apps that convey the information they need, which is not only inconvenient (when driving), but introduces the unnecessary risk of distracted driving. Specific Service signs provide a safer alternative than app-based navigation and are critical in circumstances where app-based navigation is unavailable.

Do not limit “Supplemental Messages” identifying the availability of EV charging to gas station businesses only:

The proposed revisions to “Supplemental Messages” would only allow an “EV Charging” message on a “Gas” Specific Service sign, and hence only gasoline stations offering EV charging could advertise this fact – not restaurants, hotels or local attractions. Currently, in Oregon, establishments such as restaurants already have EV charging “supplemental messages” posted on specific service signs. This proposed change would be a step backwards for the broad array of diverse establishments that offer EV charging. Allowing these businesses to advertise the availability of EV charging through a supplemental message helps drivers find fueling services and plan highway stops that meet multiple service needs.

Additional recommendations for Consideration:

- The “GAS” category of Specific Service signs should be changed to “FUEL” to support businesses that offer alternative fuels as well as those that offer gasoline. In addition to the significant number of EV charging stations, there are close to 35,000 non-gasoline fueling stations open to the public, nationwide. The MUTCD should reflect the growing diversity in vehicle and fuel types and these refueling stations should have signage parity with gasoline stations.
 - If EV Signage falls under the “FUEL” category of Specific Service signs, consider updating the existing MUTCD criteria to enable flexibility for public EV charging stations. Public EV charging stations are often co-located with other businesses with amenities, but can also be “self serve” stations in areas with few adjacent amenities. While it is optimal to encourage stations to have access to modern sanitary facilities and drinking water, the FHWA could offer flexibility to enable and support signage for stations that do not meet these current eligibility criteria for EV charging Specific and General Service signs.
- Consider adding a sixth category, “EV Charging”, to the types of traveler services that can be put on Specific Service signs. The growing number of EVs on the roads across the United States strongly supports modernizing the categories for Specific Service signage in the MUTCD. This approach was adopted by California in the 2018 *California Manual on Uniform Traffic Control Devices* and has since garnered interest from other states.
 - FHWA may want to consider additional criteria for future EV charging Specific and General Service signs, such as criteria that include adequate lighting from dusk till dawn and ADA compliant parking for at least one charging spot.
- Allow supplemental messages for any facility that qualifies for a Specific Service sign, not just gas station businesses. This includes “Food”, “Lodging”, “Camping” and “Attraction” signs as well.

Given the tremendous growth of EVs and EV charging stations projected in the coming years, we urge you to utilize this opportunity to make it easier, more convenient and safer for EV drivers to locate charging stations along our roadways. Our suggested changes not only support the Administration’s EV goals but align with an explicit directive from Congress outlined in the Consolidated Appropriations Act of 2021 for the FHWA to “allow the use of Specific Service signs for electric vehicle charging stations” in the MUTCD.

We have included an edited copy of Section J language to illustrate the simple revisions that address these concerns as an attachment.

We appreciate your consideration of our concerns and look forward to continuing to work with you to ensure a safe, sustainable and innovative transportation system for all.

Sincerely,

[Signatures on following pages]



Oregon

Kate Brown, Governor

Department of Transportation

Climate Office

555 13th Street NE

Salem, OR 97301-4179

Phone: (503) 986-3300

Fax: (503) 986-4189

RE: Docket No. FHWA-2020-0001; NATIONAL STANDARDS FOR TRAFFIC CONTROL DEVICES, THE *MANUAL ON UNIFORM TRAFFIC CONTROL DEVICES FOR STREETS AND HIGHWAY*; REVISION – EV SIGNAGE (CHAPTER J)

OREGON DEPARTMENT OF TRANSPORTATION

Signed By:

Amanda Pietz

Division Administrator, Policy, Data and Analysis

Michael Kimlinger, P.E.

State Traffic-Roadway Engineer



Oregon

Kate Brown, Governor

Travel Information Council

1500 Liberty St SE Ste 150

Salem, OR 97302-4386

RE: Docket No. FHWA-2020-0001; NATIONAL STANDARDS FOR TRAFFIC CONTROL DEVICES, THE *MANUAL ON UNIFORM TRAFFIC CONTROL DEVICES FOR STREETS AND HIGHWAY*; REVISION – EV SIGNAGE (CHAPTER J)

OREGON TRAVEL INFORMATION COUNCIL

Signed By:

Jim Denno

Executive Director



Oregon

Kate Brown, Governor



550 Capitol St. NE

Salem, OR 97301

Phone: 503-378-4040

Toll Free: 1-800-221-8035

FAX: 503-373-7806

www.oregon.gov/energy

RE: Docket No. FHWA-2020-0001; NATIONAL STANDARDS FOR TRAFFIC CONTROL DEVICES, THE *MANUAL ON UNIFORM TRAFFIC CONTROL DEVICES FOR STREETS AND HIGHWAY*; REVISION – EV SIGNAGE (CHAPTER J)

OREGON DEPARTMENT OF ENERGY

Signed By:

Alan Zelenka

Assistant Director for Planning and Innovation



Oregon

Kate Brown, Governor

Department of Environmental Quality

Agency Headquarters

700 NE Multnomah Street, Suite 600

Portland, OR 97232

(503) 229-5696

FAX (503) 229-6124

TTY 711

RE: Docket No. FHWA-2020-0001; NATIONAL STANDARDS FOR TRAFFIC CONTROL DEVICES, THE
MANUAL ON UNIFORM TRAFFIC CONTROL DEVICES FOR STREETS AND HIGHWAY; REVISION – EV
SIGNAGE (CHAPTER J)

OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY

Signed By:

Ali Mirzakhali

Air Quality Administrator

1 CHAPTER 2J. SPECIFIC SERVICE SIGNS

2 Section 2J.01 Eligibility

3 Standard:

CHAPTER 2J. SPECIFIC SERVICE SIGNS

4 Specific Service signs shall be defined as guide signs that provide road users with business
5 identification and directional information for eligible services and attractions. Eligible service
6 categories shall be limited to gasfuel, food, lodging, camping, ~~and~~ attractions and EV charging stations .

7 Guidance:

8 *The use of Specific Service signs should be limited to areas primarily rural in character with adequate*
9 *space for all signs to be properly accommodated.*

10 Option:

11 Where an engineering study determines a need, Specific Service signs may be used on any class of
12 highway, i.e. freeway, expressway, or conventional.

13 Guidance:

14 *Specific Service signs should not be installed at an interchange where the road user cannot conveniently*
15 *reenter the freeway or expressway and continue in the same direction of travel.*

16 Standard:

17 Eligible service facilities shall comply with laws concerning the provisions of public
18 accommodations without regard to race, religion, color, age, sex, or national origin, and laws
19 concerning the licensing and approval of service facilities.

20 The attraction services shall include only facilities which have the primary purpose of providing
21 amusement, historical, cultural, or leisure activities to the public.

22 Guidance:

23 *Except as provided in Paragraph 8, distances to eligible services should not exceed 3 miles in any*
24 *direction.*

25 Option:

26 If, within the 3-mile limit, facilities for the services being considered other than pharmacies are not
27 available or choose not to participate in the program, the limit of eligibility may be extended in 3-mile
28 increments until one or more facilities for the services being considered chooses to participate, or until 15
29 miles is reached, whichever comes first.

30 Standard:

31 If State or local agencies elect to provide Specific Service signing, there shall be a statewide policy
32 for such signing and criteria for the availability of the various types of services.

33 Guidance:

34 *The criteria for the statewide policy should consider the following:*

35 A. To qualify for a GAS-FUEL business identification sign panel, a business should have:

- 36 1. Vehicle services including gasoline or alternative fuels, oil, and water;
- 37 2. Continuous operation at least 16 hours per day, 7 days per week for freeways and expressways,
38 and continuous operation at least 12 hours per day, 7 days per week for conventional roads;
- 39 3. Modern sanitary facilities and drinking water; and
- 40 4. Public telephone.

41 B. To qualify for a FOOD business identification sign panel, a business should have:

- 42 1. Licensing or approval, where required;
- 43 2. Continuous operations to serve at least two meals per day, at least 6 days per week;
- 44 3. Modern sanitary facilities; and
- 45 4. Public telephone.

46 C. To qualify for a LODGING business identification sign panel, a business should have:

- 47 1. Licensing or approval, where required;
- 48 2. Adequate sleeping accommodations;

- 49 3. Modern sanitary facilities; and
50 4. Public telephone.
51 D. To qualify for a CAMPING business identification sign panel, a business should have:

- 1 1. Licensing or approval, where required;
2 2. Adequate parking accommodations; and
3 3. Modern sanitary facilities and drinking water.

4 E. To qualify for an ATTRACTION business identification sign panel, a facility should have:

- 5 1. Regional significance, in compliance with the provisions of Paragraph 6; and
6 2. Adequate parking accommodations.

F. To qualify for a EV CHARGING STATION business identification sign panel, a business should have:

1. Continuous operation at least 16 hours per day, 7 days per week for freeways and expressways, and continuous operation at least 12 hours per day, 7 days per week for conventional roads, except that the qualified business shall not be considered to be in violation of this requirement when, as a result of a shortage of electricity, the facility is closed or when its hours of operation are reduced.;

2. A Logo permittee for Food, Fuel, Lodging or Camping may include the legend "EV CHARGING" which represent this service across the bottom of their permitted Logo sign panel, if they also offer EV CHARGING within 3 miles of a freeway interchange, and make this service available at least 16 hours daily, seven (7) days a week.

6

7 Support:

8 Section 2J.12 contains additional information on criteria for the statewide policy regarding signing.

9 Section 2I.04 contains information regarding the Interstate Oasis program.

10 **Section 2J.02 Application**

11 **Standard:**

12 The number of Specific Service signs along an approach to an interchange or intersection,
13 regardless of the number of service types displayed, shall be limited to a maximum of four. In the
14 direction of traffic flow, successive Specific Service signs shall be for EV charging station, attraction,
15 camping, lodging, food,
16 and gas-fuel services, in that order.

16 **Guidance:**

17 The Specific Service signs should be located to take advantage of natural terrain, to have the least impact
18 on the scenic environment, and to avoid visual conflict with other signs within the highway right-of-way.

19 Where a service type is displayed on two signs, the signs for that service should follow one another in
20 succession.

21 **Standard:**

22 A Specific Service sign shall display the word message GASFUEL, FOOD, LODGING, CAMPING,
23 EV CHARGING STATION, or
24 ATTRACTION, an appropriate directional legend such as the word message EXIT XX, NEXT RIGHT,
25 SECOND RIGHT, or directional arrows, and the related business identification sign panels. Distances
26 to eligible facilities shall not be displayed on the Specific Service signs on the approach to an
interchange.

~~27 A business that does not offer gasoline but offers alternative fuels shall not be signed using GAS~~
~~28 Specific Service signs.~~

~~29 Option:~~

~~30 A business that does not offer gasoline but offers alternative fuels may be signed using General Service~~
~~31 signs for the alternative fuel provided.~~

~~32 Support:~~

~~33 General Service signs for facilities providing alternative fuels, including Electric Vehicle Charging,~~
~~34 Compressed Natural Gas, Liquefied Natural Gas, Liquefied Propane Gas, and Hydrogen fuel, are provided in~~

~~35 Chapter 2I.~~

~~36 Specific Service signs are intended for areas primarily rural in character. When services at an interchange~~

~~37 are abundant, this is an indication that the character of the area is no longer primarily rural and General~~
~~38 Service signs would be more appropriate.~~

~~39~~27 *Guidance:*

~~40~~28 *Due to the unique and widely varying characteristics of the services that qualify as attractions, and lesser*
~~41~~29 *recognition of their business identification sign panels (see Paragraph 10), ATTRACTION Specific Service*
~~42~~30 *signs should have no more than four business identification sign panels.*

~~43~~31 *Support:*

~~44~~32 The types of services that meet the definition of attraction, i.e. those providing amusement, historical,
~~45~~33 cultural, or leisure activities to the public, vary considerably. In most cases, attractions do not include well-
~~46~~34 known services or easily recognizable logos, making it more difficult and requiring more time to distinguish
~~47~~35 between types of attractions shown on an ATTRACTION sign than for other categories of Specific Service
~~48~~36 signs.

~~49~~37 *Standard:*

~~50~~38 **No more than three types of services shall be represented on any sign or sign assembly. If three**
~~51~~39 **types of services are displayed on one sign, then the business identification sign panels shall be limited**
~~52~~40 **to two for each service type (for a total of six business identification sign panels). If two types of**

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1 **services are displayed on one sign, then the business identification sign panels shall be limited to either**
2 **three for each service type, or four for one service type and two for the other service type (for a total of**
3 **six business identification sign panels in either case). The legend and business identification sign panels**
4 **applicable to a service type shall be displayed such that the road user will not associate them with**
5 **another service type on the same sign. Other configurations or arrangements of business identification**
6 **sign panels shall not be allowed.**

7 **No service type shall appear on more than two signs (see Paragraph 3 of this Section).**

8 **The signs shall have a blue background, a white border, and white legends of upper-case letters,**
9 **numerals, and arrows.**

10 *Guidance:*

11 *If a service type is no longer available from an interchange or intersection the sign should be removed*
12 *when the business identification sign panels are removed. If a sign is to remain, but the service type is no*
13 *longer available, then the service type legend should be covered so that road users do not misinterpret the*
14 *sign as a General Service sign implying that the service is available.*

15 *No sign should be installed when a service type is not currently available from an interchange or*
16 *intersection.*

17 *Option:*

18 *If there is indication that a service of this type will again be available in the near future, the sign may be*
19 *covered, in accordance with Paragraph 13, rather than removed.*

20 *Separate installations of General Service signs (see Sections 2I.02 and 2I.03) may be used in conjunction*
21 *with Specific Service signs for eligible types of services that are not represented by a Specific Service sign.*

22 *Support:*

23 *Examples of Specific Service signs are shown in Figure 2J-1. Examples of sign locations are shown in*
24 *Figure 2J-2.*