

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:

The Iowa Clean Cities Coalition is a coalition that works to increase the use of alternative fuels in our state, therefore increasing national security -by reducing our demand on foreign entities to supply our fuel- and decreasing Green House Gas emissions in transportation sector.

We strongly agree with your 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.”¹

As such, the Iowa Clean Cities Coalition would like to draw your attention to a few concerning proposed changes to the Manual Uniform on Traffic Control Devices (MUTCD) by the Federal Highways Administration.

Concerning Proposed Changes to the MUTCD by FHWA:

- Alternative Fuel stations will be prohibited from using Specific Service signs unless they are also 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.
- 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.

Global oil consumption has peaked in the developed world and the International Energy Agency states that they do not predict a return to 2019 levels of gasoline consumption.² In February of 2020 there were approximately 115,000 gas stations in America.³ Currently there are 48,457 fueling stations offering alternative fuel in America, of these, 34,857 do not sell gasoline.⁴

¹ <https://www.transportationandclimate.org/statements-state-leaders-launch-tci-p>

² <https://www.wsj.com/articles/never-mind-peak-oil-global-forecaster-calls-peak-gasoline-11615988228>

³ <https://www.marketwatch.com/story/how-many-gas-stations-are-in-us-how-many-will-there-be-in-10-years-2020-02-16>

⁴ <https://afdc.energy.gov/stations/#/find/nearest?country=US>

The proposed changes listed above would prohibit the 34,857 non-gasoline offering alternative fueling stations from having highway and interstate signage making it that much more difficult for alternative fuel powered vehicle drivers to find the fueling they need.

The transportation sector is facing monumental pressure to decarbonize. In response, there has been a major shift in the light-duty vehicle market towards electric vehicles. Volvo, Jaguar and Honda have all committed to selling only Electric Vehicles by 2025, 2030 and 2040 respectively. Ford has committed to being a primary electric vehicle company by 2035. General Motors has committed to eliminating all tailpipe emissions from their new vehicles by 2030. Daimler is splitting into two companies one for heavy duty and one for light duty vehicles both heavily focused in electrification. The Biden Administration has committed to building 550,000 electric vehicle charging stations. Daimler, Ford, and General Motors all have committed to building out electric vehicle charging station networks. As more and more people adopt Electric Vehicles the mainstream need is going to be finding charging stations, not gas stations during their travels.

Large and small companies in the transportation sector are adopting the use of alternative fuel vehicles to lower their carbon footprints and help meet their supplier's sustainability goals. Low carbon, locally produced, alternative fuel vehicles are needed to keep a competitive edge. Many municipalities are taking advantage of these fuels as well to reduce air pollution, increase quality of life, and decrease overall emissions in their community.

There is a need and demand for signage to these stations today, this need will only increase in the future.

A common argument against alternative fueling station signage is "there are apps for that," that meaning, finding alternative fueling stations. However, there are also apps that aid in finding gas stations. If the existence of an app constitutes the prohibiting of signing for that service, then it is reasonable to assume this should be applied to gas station signage as well.

Each day in this country eight people die due to distracted driving. Each year over 3,000 people die from distracted driving and over 400,000 are injured.⁵ The US DOT, State DOTs, and law enforcement work hard to prevent and stop distracted driving through marketing campaigns, introducing new laws, and enforcement of these new laws. Encouraging drivers to use an app to identify nearby fueling station locations works in direct opposition to that message.

The current version of the MUTCD states:

"The purpose of the MUTCD is to establish national criteria for the use of traffic control devices that meet the needs and expectancy of road users on all streets, highways, bikeways, and site roadways open to public travel. This purpose is achieved through the following objectives:

- A. Promote national uniformity in the meaning and appearance of traffic control devices.
- B. Promote national consistency in the use, installation, and operation of traffic control devices.
- C. Provide basic principles for traffic engineers to use in making decisions regarding the use, installation, operation, maintenance, and removal of traffic control devices.
- D. Promote safety and efficiency through appropriate use of traffic control devices."

⁵ <https://afdc.energy.gov/stations/#/find/nearest?country=US>

It goes on to say:

“The purpose of traffic control devices, as well as the principles for their use, is to promote highway safety and efficiency by providing for the orderly movement of all road users on streets, highways, bikeways, and private roads open to public travel throughout the Nation.”

The descriptions of purpose above both reference road users as end user of these devices. Not only gasoline powered vehicle drivers, or only EV drivers, or only CNG powered vehicle drivers, but road users.

We believe that all fueling stations should be able to sign equally to road users and offer the following suggestions:

- 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.
- States should have 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 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.

Additionally, the FHWA has held five rounds of designations for Alternative Fuel Corridors in the nation, designating over 165,700 miles of the national highway system in 49 states and the District of Columbia as alternative fuel corridors. The alternative fuel corridors webpage of FHWA.dot.gov states that with these designations “FHWA is establishing a national network of alternative fueling and charging infrastructure along national highway system corridors.” It further goes on to say “FHWA intends to support the expansion of this national network.”⁶

FHWA published goals of the alternative fuel corridor program in the federal register in 2016, they include:

- 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

In order to support and promote the expansion of a national network of alternative fueling and charging infrastructure, customers need to safely identify and locate these fueling stations as easy as their ICE vehicle driving counterparts locate stations that sell gasoline.

⁶ <https://www.govinfo.gov/content/pkg/FR-2016-07-22/pdf/FR-2016-07-22.pdf>

We ask that you reevaluate and find a way to meet your stated goal of developing national signage and branding for alternative fuel corridors and the alternative fueling stations that make up these corridors.

Finally, as you know, low public awareness about the availability of domestically produced alternative transportation fuels is a large barrier to increasing adoption. 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. However, we believe that 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.

We offer the following suggestion:

- 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.

Thank you for your time,

MK Anderson- Coordinator, Iowa Clean Cities Coalition