NATIONAL PROPANE GAS ASSOCIATION

May 14, 2021

Docket Management Facility
U.S. Department of Transportation, West Building
Ground Floor, Rm. W12-140
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Re: National Standards for Traffic Control Devices; the Manual on Uniform Traffic Control Devices for Streets and Highways; Revision {FHWA-2020-0001}

This comment provides the response of the National Propane Gas Association (NPGA) to the Notice of Proposed Amendments (NPA) by the Federal Highway Administration (FHWA) regarding the Manual on Uniform Traffic Control Devices for Streets and Highways (MUTCD).[1] FHWA proposes to amend the MUTCD to reflect advances in technologies, promote uniformity, and improve the safe and efficient utilization of public roads.[2] Among the proposed changes, FHWA proposes to prohibit alternative fuel signage from GAS signage and limit alternative fuel signage among supplemental messages.[3] NPGA opposes these changes to alternative fuel signage as unjustified and likely to cause the type of public confusion FHWA intends to eliminate through the NPA.[4]

NPGA is the national trade association of the propane industry with a membership of about 2,500 companies, and 38 state and regional associations representing members in all 50 states. NPGA's membership includes retail marketers of propane gas who deliver the fuel to the end user, propane producers, transporters and wholesalers, and manufacturers and distributors of equipment, containers, and appliances. Propane gas, sometimes more broadly referred to as liquefied petroleum gas (LPG), is used in over 18 million installations nationwide for home and commercial heating and cooking, in agriculture, in industrial processing, and as a clean air alternative engine fuel for both over-the-road vehicles and industrial lift trucks.

Many members of NPGA supply propane as a vehicle fuel – known as autogas. NPGA members also provide propane autogas equipment and vehicle engine conversion kits, and they participate in the research and technological development to advance propane as an efficient and clean alternative vehicle fuel. EPA recognizes propane as a clean, alternative fuel within the Clean Air Act, possessing lower emissions of hydrocarbons than gasoline and significantly less GHG emissions.[5] Propane autogas fuels

[1] Federal Highway Administration, National Standards for Traffic Control Devices; the Manual on Uniform Traffic Control Devices for Streets and Highways; Revision, 85 Fed. Reg. 240, 80898 (proposed Dec. 14, 2020) (to be codified at 23 CFR pts. 470, 635,655).
[2] *Id*.
[3] *Id*. at 80935.
[4] *Id*. at 80898.
[5] Office of Mobile Sources, *Clean Fuels: An Overview*, U.S. Envtl Prot.n Agency, 2 (August 1994), *available at* https://www3.epa.gov/otaq/consumer/06-clean.pdf.

private and public passenger vehicles and light duty trucks in the U.S., such as police fleets,[6] park service vehicles,[7] and regional delivery vehicles.[8]

As a widely utilized, abundant alternative fuel across the U.S., propane autogas users rely on highway signage to identify refueling locations.[9] In fact, there are more than 200,000 propane autogas vehicles on the road in the U.S. including passenger vehicles and light duty trucks manufactured by OEMs like Ford, Chevrolet, and General Motor Company.[10] A unique advantage that propane autogas possesses is the diverse nature in the types of refueling stations that are available to support local and regional fleets, all of which come with reasonable installation costs.[11] Today's highways feature thousands of propane autogas fueling stations across the country.[12] Furthermore, the potential growth of propane autogas is exponential as various government research programs investigate engine technology and efficiency improves of propane combined with other alternative fuels.[13]

For example, the Clean Cities initiative by the U.S. Department of Energy awards funding to local governments for the procurement of propane vehicles.[14] In a partnership with Clean Cities, the Department of Energy's Argonne National Laboratory evaluated the replacement of 22 diesel commercial delivery trucks with propane autogas vehicles.[15] Research revealed that less than two dozen propane autogas vehicles displaced over 38,000 gallons of diesel annually and reduced greenhouse gas emissions by 80 tons annually.[16]

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[6] *See e.g.*, Propane Education & Research Council, Sandy Springs Police Dep't Case Study, https://propane.com/for-my-business/fleet-vehicles/sandy-springs-police-department-case-study/ (last visited May 11, 2021).
[7] *See e.g.*, Press Release, Propane Education & Research Council, Fueling America's National Parks, https://propane.com/2018/10/01/fueling-americas-national-parks/ (Oct. 1, 2018).
[8] *See e.g.*, Propane Education & Research Council, Go the Distance, https://propane.com/for-my-business/fleet-vehicles/ (last visited May 11, 2021).
[9] Energy Inform. Admin., Today in Energy, U.S. net energy imports in 2017 fall to their lowest levels since 1982 (March 28, 2018), https://www.eia.gov/todayinenergy/detail.php?id=35532.
[10] U.S. Dep't of Energy, Energy Efficiency & Renewable Energy, Alternative Fuels Data Center, Model Year 2018 Alternative Fuel and Advanced Technology Vehicles, 18 (August 7, 2018), *available at* https://www.afdc.energy.gov/vehicles/propane.html; *see also* U.S. Dep't of Energy, Energy Efficiency & Renewable Energy, Alternative Fuels Data Center, Tools: Vehicle Search, https://www.afdc.energy.gov/vehicles/search/results?view_mode=grid&search_field=vehicle&search_dir=desc&per_page=8&current=true&display_length=25&fuel_id=55,-1&all_categories=y&manufacturer_id=365,377,211,410,235,231,215,223,225,409,379,219,213,209,351,359,385,275,424,361,387,243,227,239,425,263,217,391,349,381,237,221,347,395,-1 (last updated March 14, 2018).
[11] U.S. Dep't of Energy, Energy Efficiency & Renewable Energy, Alternative Fuels Data Center, Propane Fueling Infrastructure Development, https://afdc.energy.gov/fuels/propane_infrastructure.html (last visited May 5, 2021).
[12] U.S. Dep't of Energy, Energy Efficiency & Renewable Energy, Alternative Fuels Data Center, Propane Fueling Station Locations, https://www.afdc.energy.gov/fuels/propane_locations.html#/find/nearest?fuel=LPG (last visited May 11, 2021).
[13] Alternative Fuels Data Ctr., *Propane Vehicles*, U.S. Dep't of Energy, http://www.afdc.energy.gov/vehicles/propane.html (last updated April 13, 2016).
[14] U.S. Dep't of Energy, Energy Efficiency & Renewable Energy, *Clean Cities Partnerships and Projects*, https://cleancities.energy.gov/partnerships/ (last visited May 11, 2021); *see e.g.* Austin Financial and Administrative Services, *Conservation Research and Development: Propane Vehicles*, City of Austin, http://www.austintexas.gov/page/conservation-research-and-development-propane-vehicles (last visited May 11, 2021).
[15] Press Release, Argonne National Laboratory, Bakery switches to propane vans (April 21, 2016) https://www.anl.gov/article/bakery-switches-to-propane-vans.
[16] *Id*.

NPGA strongly discourages FHWA from removing alternative fuels from the qualifications for GAS business signage.[17] We disagree with the agency's presumption that signage for alternative fuel stations under the GAS business identification sign panel causes driver confusion.[18] In contrast, we argue that drivers review GAS signage as an indication for all fueling infrastructure rather than singularly associating GAS signage with gasoline.[19]

FHWA does not present any evidence, research or other information to demonstrate that listing alternative fuel stations under GAS causes driver confusion.[20] In fact, FHWA appears to contradict itself by proposing that gasoline stations may identify alternative fuel services on GAS signage.[21] By permitting gasoline stations to identify alternative fuel options on GAS signage, FHWA implicitly acknowledges that drivers review GAS signage for information on alternative fuel stations. Therefore, GAS signage should continue to permit identification of alternative fuel stations regardless of the presence of traditional gasoline. Further, FHWA also fails to present any research to demonstrate that drivers would associate General Services signage with alternative fuel stations, which is proposed in the NPA.[22]

The proposed signage changes in the NPA relative to alternative fuel would generate significant driver confusion and, ultimately, hinder the proliferation of alternative fuels throughout the American highway system. FHWA should withdraw the proposed GAS signage changes with respect to alternative fuels. Propane autogas is a modern alternative fuel worthy of federal support to encourage market proliferation and infrastructure development. The proposed signage changes would effectively deter fueling station development and confuse public and private drivers currently operating alternative fuel vehicles.

Thank you for the opportunity to comment on the NPA. Please feel free to contact us with any additional questions.

Sincerely,

Sarah J. Reboli
Senior Director, Regulatory & Industry Affairs
National Propane Gas Association

[17] *Supra* note 1, at 80935.
[18] *Id*.
[19] *Id*.
[20] *See id*.
[21] *Id*.
[22] *Id*.