

May 14, 2021

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

Attention: Docket No. FHWA 2020-001

RE: National Standards for Traffic Control Devices; the Manual on Uniform Traffic Control Devices for Streets and Highways; Revision

Dear Acting Administrator Pollack:

Clean Energy NH, NH Electric Co-op, ReVision Energy, NH Automobile Dealer's Association, Ceres, and the Nature Conservancy New Hampshire, offer the following comments on the Federal Highway Administration's (FHWA's) notice of proposed amendments to the National Standards for Traffic Control Devices: Manual on Uniform Traffic Control Devices (MUTCD), 85 Fed. Reg. 80898 (December 14, 2020). We represent stakeholders actively working to promote electric vehicle (EV) adoption and the build-out of accessible charging infrastructure across the Granite State. Our comments are focused on the need to provide states, including New Hampshire, with greater flexibility to expand highway signage about EV charging stations, thus ensuring that highway signage can keep pace as consumer adoption of EVs accelerates.

We urge you to consider the following:

- The proposed amendments would prohibit states such as New Hampshire from allowing businesses that offer EV charging to appear on Specific Service (highway logo) signs in most circumstances.
- As the EV market is nearing a point of inflection, the proposed MUTCD revisions should give states flexibility to expand highway signs that provide information about charging services available to EV motorists. The fact that previous editions of the MUTCD have remained in effect for at least five to ten years underscores the need for the upcoming edition to address this.
- Evidence of an approaching inflection point in EV market growth include:
 - Automakers and suppliers have pledged \$250 billion in electrification investments by 2023 and IHS Markit projects there will be 130 EV models available in the U.S. by 2026.¹ These models will be offered at a range of purchase prices and will

¹ Auto Industry EV Policy Letter to President Biden. Alliance for Automotive Innovation. March 30, 2021. Available at <https://www.autosinnovate.org/posts/press-release/ev-policy-letter-to-president->

include popular vehicle types such as SUVs and crossovers that were not widely available during the early years of the market but are highly desirable to consumers, especially in New England's wintry climate, and;

- Recent consumer surveys show that interest in considering an EV purchase is also on the rise.² There are a range of projections for how quickly the number of EVs on the nation's roads will increase over the next decade, but most industry experts expect a large jump. A recent analysis by Deloitte, for example, projects that EVs will make up 27 percent of new vehicle sales in the United States by 2030³.
- As more Americans make the switch to driving electric, the number of charging stations along highway corridors is expected to grow significantly. Consider that:
 - According to the Department of Energy's National Renewable Energy Lab, there are now more than 1,200 fast charging stations with 5,000 connectors located within 5 miles of an FHWA designated EV corridor;
 - EV charging providers, such as Electrify America and others, have announced plans to continue significant investments in corridor charging during the next several years and beyond to provide charging for long-distance travel and to meet the needs of EV motorists without home charging. These stations will deliver faster charging times as technology improves, with many able to deliver a full charge in 20 minutes or less. Utility investments, along with public grant and incentive programs, will also support the buildout of corridor charging networks;
 - President Biden's recently announced *America Jobs Plan* seeks to add 500,000 new charging stations across the U.S. and pledges federal funding to support this deployment⁴, and;
 - Indicative of the transition to EVs, Shell Oil has announced plans for 500,000 chargers globally.
- As the number of EVs grows, these drivers will need highway signs that help them safely and conveniently locate charging stations, as traditional gas station signs perform currently. Adequate signage will be especially important in the transitional phase before charging stations become as common as gasoline and diesel fueling stations.

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² See for example: "New Consumer Reports survey finds majority of drivers are interested in electric vehicles," *Consumer Reports*, December 17, 2020 Available at: https://advocacy.consumerreports.org/press_release/new-consumer-reports-survey-finds-most-drivers-are-interested-in-electric-vehicles/.

³ "Electric Vehicles, Setting a Course for 2030," *Deloitte Insights*, July 28, 2020. Available at: <https://www2.deloitte.com/us/en/insights/focus/future-of-mobility/electric-vehicle-trends-2030.html>.

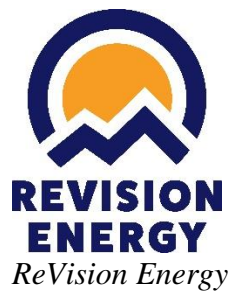
⁴ White House Fact Sheet: Biden Administration Advances Electric Vehicle Charging Infrastructure, APRIL 22, 2021, Available at: <https://www.whitehouse.gov/briefing-room/statements-releases/2021/04/22/fact-sheet-biden-administration-advances-electric-vehicle-charging-infrastructure/>

- A driver who misses a station when running low on their vehicle's charge could become stranded on the roadway, a safety risk particularly in rural areas with limited cellular service or roadside assistance services available. Signs are needed both to alert motorists when charging is available at an exit, and to inform them about which facilities or businesses offer charging services.
- FHWA's proposed revisions to the MUTCD would curtail states ability to provide such signs in two important ways:
 - First, the revisions would explicitly prohibit EV charging facilities that do not also sell gasoline from qualifying for placement on a Specific Service sign. FHWA proposes that states can use blue General Service signs with a generic symbol of a charging station.⁵ However, these signs do not provide information about which businesses or facilities offer charging, information that is important for enabling drivers to locate charging services.
 - Second, FHWA's revisions would allow gas stations that qualify for placement on GAS Specific Service signs to notify motorists that they offer charging services by adding "EV CHARGING" as a supplemental word message under their business logos, but other businesses qualifying for placement on a FOOD, LODGING or ATTRACTION Specific Service sign would be prohibited from using such messages.⁶
- At present, there are few charging stations installed at gas stations. These charging stations are much more commonly found at restaurants, hotels, retail centers, and tourist attractions. Allowing gas stations to inform EV motorists of available charging services using supplemental messages while prohibiting other businesses from doing the same is arbitrary and fundamentally unfair to EV drivers and to the businesses providing these important traveler services.
- FHWA should update the MUTCD in a manner that gives states flexibility to add EV charging facilities to their existing sign programs, including their Specific Service sign programs. There are many indications, as described above, that the EV market is approaching an inflection point and states need to be able to signify to drivers where charging is available.
- States need to ensure that there is sufficient highway signage to serve the growing number of motorists who refuel with electricity instead of with gasoline or diesel.

Sincerely,

⁵ 85 Fed. Reg. at 80,935.

⁶ *Ibid.*



The Nature Conservancy, New Hampshire

