



May 12, 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 HIGHWAYS; REVISION**

Dear Acting Administrator Pollack:

NGVAmerica respectfully provides the following comments in response to the proposed changes to the Manual on Uniform Traffic Control Devices (MUTCD). NGVAmerica and its members are concerned that the proposed changes could negatively impact efforts to promote greater awareness concerning the availability of alternative fuels and ultimately lessen demand for alternative fuels. In particular, we believe that it is important that the MUTCD rules provide parity between signage rules for gasoline fueling stations and alternative fueling stations and do not undermine the congressional intent for the Alternative Fuels Corridor Program established by section 1413 of the FAST Act.¹

NGVAmerica is the national trade organization dedicated to the development of a growing, profitable, and sustainable market for vehicles and carriers powered by clean, affordable, and abundant geologic and renewable natural gas (RNG). Our roughly 200 member companies produce, distribute, and market natural gas and biomethane, domestically manufacture and service natural gas vehicles, engines, and equipment, and operate fleets powered by clean-burning gaseous fuels across North America.

The FAST Act 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 2016, the Federal Highway Administration published goals of the alternative fuel corridor program in the federal register², including: 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.” FHWA at the time

¹ <https://www.congress.gov/bill/114th-congress/house-bill/22/text/enr>

² 81 Fed. Reg. 47,850 (July 22, 2016).

noted that this program will support lower-emitting vehicles and assist in achieving reductions of greenhouse gas emissions – goals that continue to be of utmost importance.

The bullets below summarize our recommended changes for revising the MUTCD.

We recommend the following changes to the MUTCD rules:

- 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. Precedent for this recommendation already exists, some states that have changed GAS to FUEL in their own version of the manual.
- States should have the flexibility to use either General Service or Specific Service signs for Alternative fuel 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.
- 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.

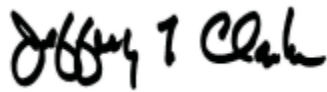
We oppose the following proposed MUTCD changes:

- Alternative Fuel stations will be prohibited from using Specific Service signs unless they are also a gasoline station. This change would mean that the only transportation fueling stations permitted to display their logo on a highway sign will be 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. For example, a gasoline station could indicate on their GAS sign logo they have natural gas or electric vehicle charging available but a standalone, non-gasoline vehicle fueling station has no way to include a natural gas logo on a sign.
- 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. This provision, for example, would prohibit a coffee shop 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. This is against the wishes of many states that would prefer to sign for alternative fueling stations using Specific Service signs.
- 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. States should not, however, be prohibited from using the Alternative Fuels Corridor sign for the sole purpose of raising corridor awareness in a manner consistent with what FHWA published in the federal register in 2016.

Thank you for your consideration of these comments and future support for the Alternative Fuels Corridor Program.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey T. Clark". The signature is written in a cursive, slightly stylized font.