

# Manual on Uniform Traffic Control Devices/FHWA Proposed Amendments: NESCAUM Comments Addressing Impact on Electric Vehicles



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The Northeast States for Coordinated Air Use Management (“NESCAUM”) submitted May 14th comments addressing the Federal Highway Administration’s (“FHWA”) proposed amendments to the National Standards for Traffic Control Devices: Manual on Uniform Traffic Control Devices (“MUTCD”). See 85 Fed. Reg. 80809 (December 14, 2020).

NESCAUM describes itself as a:

. . . regional association of air pollution control agencies representing Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, and Vermont.

The organization states that it provides technical analysis and policy advice to its member states in regards to air pollution, climate and clean transportation issues.

An additional focus is stated to include facilitation of a multi-state initiative to accelerate electric vehicle adoption.

The focus of the NESCAUM comments is concern that the proposed MUTCD amendments:

. . . would prohibit states from allowing businesses that offer EV charging to appear on Specific Service (highway logo) signs in most circumstances.

This concern is driven by the organization’s belief that the EV market is nearing a “point of inflection.” As a result, it argues that the referenced amendments should provide the states the flexibility to expand highway signs that provide information about charging services available to EV motorists. This is viewed as a time sensitive issue because of a perceived concern that MUTCD changes have in the past remained in effect for five to 10 years.

Additional assertions in the NESCAUM comments include:

- Multiple developments indicate an approaching inflection point in the EV market growth:
- Automakers and suppliers have pledged \$250 billion in electrification investments by 2023
- Projections that 130 EV models will be available in the United States by 2026
- Consumer surveys indicating increasing interest in EV purchases
- The California Zero Emission Vehicle regulation requiring automakers to deliver increasing number of such vehicles to the market will increase sales growth

- Increasing number of Americans driving EVs will result in exponential growth of charging stations in highway corridors
- The U.S. Department of Energy estimates the existence of 1200 fast-charging stations with 5,000 ports located within five miles of an FHWA designated EV corridor
- Charging providers have announced plans to continue significant investments in corridor charging
- Utility investments/public grant and incentive programs will support the buildout of corridor charging networks

NESCAUM argues that such developments will result in EV motorists needing highway signs to help them locate charging stations. This is deemed particularly important over the next few years as such stations will be less frequent and missing one could result in a motorist becoming stranded on a roadway.

The comments suggest the following concerns about the FHWA MUTCD amendments:

- Explicitly prohibiting EV charging facilities that do not sell gasoline from qualifying for placement on a Specific Service sign
- Allowing gasoline 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 disallowing other businesses qualifying for placement on a food, etc., Specific Service sign from using such messages)

A copy of the comments can be downloaded [here](#).