

VIA USPS & ELECTRONIC MAIL

June 22, 2015

Thomas G Echikson, Chief Counsel (HCC-1)
Federal Highway Administration
Room E82-328 (HCC)
U.S. Department of Transportation
1200 New Jersey Ave., S.E.
Washington, D.C. 20590-9898

Dear Mr. Echikson:

As lead state transportation officials, we are writing to seek clarification on the extent to which fees may be charged for the use of electric vehicle (EV) charging stations installed at rest areas and fringe or corridor parking facilities located within interstate rights-of-way (ROW). Providing greater clarity on this issue is needed so that state transportation departments and their partners across the country can better plan for adequate access to charging infrastructure along public highways to make charging more convenient and increase range confidence for plug-in electric vehicle (PEV) drivers.

Transportation electrification is a critical strategy in our long-term efforts to reduce greenhouse gas emissions in the transportation sector. Like the federal government, our states recognize that PEVs “represent a key pathway for reducing petroleum dependence, enhancing environmental stewardship and promoting transportation sustainability, while creating high quality jobs and economic growth.”¹ To this end, our states are working together to place 3.3 million zero emission vehicles on our roads by 2025.²

We agree with the U.S. Department of Transportation’s observation that “facilities within highway ROW . . . may offer convenient locations” for EV charging.³ With state and federal transportation dollars stretched thin, however, it is increasingly difficult to justify installing and operating EV chargers unless our states have the ability to recoup some of the costs, especially as the number of PEVs on our roadways increases. Clarifying the circumstances in which states may charge fees at EV charging installations at rest areas and fringe or corridor parking facilities located within interstate ROW will advance our efforts to strategically deploy charging infrastructure to accelerate PEV market growth and build a more sustainable transportation system.

¹ U.S. DOE, One Million Electric Vehicles by 2015: January 2011 Status Report, available at: http://www1.eere.energy.gov/vehiclesandfuels/pdfs/1_million_electric_vehicles_rpt.pdf.

² See State Zero-Emission Vehicle Programs Memorandum of Understanding and the Multi-State ZEV Action Plan, available at: <http://www.nescaum.org/topics/zero-emission-vehicles>.

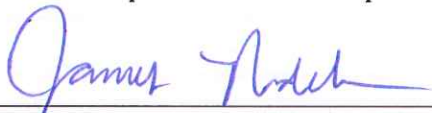
³ U.S. DOT, Alternative Uses of Highway Right-of-Way: Accommodating Renewable Energy Technologies and Alternative Fuel Facilities (Jan. 2012), available at: http://www.fhwa.dot.gov/real_estate/publications/alternative_uses_of_highway_right-of-way/

Thank you for your consideration of our request.

Sincerely,



Malcolm Dougherty, Director
California Department of Transportation



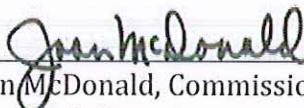
James P. Redeker, Commissioner
Connecticut Department of Transportation



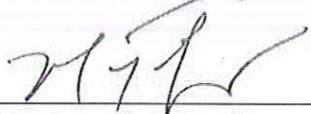
Pete K. Rahn, Secretary
Maryland Department of Transportation



Stephanie Pollack, Secretary
Massachusetts Department of Transportation



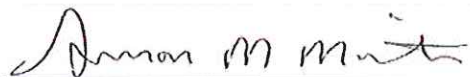
Joan McDonald, Commissioner
New York State Department of Transportation



Matthew Garrett, Director
Oregon Department of Transportation



Peter Alviti, Jr., Director
Rhode Island Department of Transportation



Sue Minter, Secretary
Vermont Agency of Transportation

Cc: (Via e-mail)

Vincent Mammano, California Division Administrator, FHWA

Amy D. Jackson-Grove, Connecticut Division Administrator, FHWA

Gregory Murrill, Maryland Division Administrator, FHWA

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Michael Canavan, New York Acting Division Administrator, FHWA

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Carlos Machado, Rhode Island Division Administrator, FHWA

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