

January 28, 2022

U.S. Department of Transportation  
Federal Highway Administration  
1200 New Jersey Avenue SE  
West Building Ground Floor, Room W12-140  
Washington, DC 20590-0001

RE: Development of Guidance for Electric Vehicle Charging  
Infrastructure Deployment  
Agency/Docket Number: FHWA-2021-0022

Via Federal eRulemaking Portal: <http://www.regulations.gov>

Dear Sir or Madam:

The RV Industry Association (RVIA) is pleased to comment on the Federal Highway Administration's (FHWA) development of guidance for two new electric vehicle (EV) charging station programs included in the recently enacted Bipartisan Infrastructure Law.

RVIA is the leading voice of the \$114 billion RV industry, representing approximately 470 manufacturers and component and aftermarket suppliers who together produce 98 percent of all RVs made in the United States. For decades, the RV industry has been growing with more diverse Americans turning to RVs as the perfect way to experience the great outdoors. For example, 600,240 RVs were produced (shipped) in 2021, by far the most ever built in a single year, surpassing the previous record set in 2017 by 19% and the number of RVs built in 2020 by nearly 40%.

RVIA adamantly supports the Biden Administration's priority to increase access to the outdoors for all Americans. We also support establishing grant and incentive programs for state and local governments and the private sector to build a national network of EV charging stations. Indeed, several RV manufacturers and suppliers have already developed and are continuing to develop state-of-the-art electric zero-emission motorhomes, travel trailers, and generators. These units incorporate advanced drivetrain and battery packages that power not only the vehicle in transit but the living systems of the RV, such as overnight air conditioning, entertainment, personal medical devices, and other integral appliances while at a campsite or destination.

The impacts of climate change are a severe threat to the enjoyment of the outdoors for future generations. The same consumer demand and concerns about greenhouse gas emissions that are driving electric power automobile and truck applications are also spurring electrified RV products. Therefore, we need a robust EV charging infrastructure, particularly in rural areas, national/state parks and forests, gateway communities, and private campgrounds that lie just outside our iconic public lands and waters.

RVIA draws FHWA's attention to the five specific issues below.

***1. Development of and improvement to electrical vehicle charging and hydrogen, propane, and natural gas fueling stations are critical to the outdoor recreation economy given the increased traffic.*** National Park tourism has surged over the past several years. Several U.S. national parks set new

attendance levels in 2021 including Great Smoky Mountains National Park, Yellowstone, Grand Teton, Acadia, Arches, and Glacier. Remote work and the desire to connect with the outdoors have brought more people into gateway communities and campgrounds that surround our national parks, forests, and seashores. The \$689 billion outdoor recreation economy represents 1.8 percent of GDP, supports 4.3 million jobs, builds healthy communities, and strengthens the health and well-being of Americans. Much of America's recreation infrastructure on federally managed lands is associated with revenue streams – entrance and activity fees; campground, slip and boat launch fees; licenses and registration fees; and excise and fuel taxes. We need a robust EV charging infrastructure to support the increased traffic to our parks and campgrounds to accommodate innovative new vehicles and RVs.

**2. Consumer demand and innovation are spurring electrified RV products.** As we mention in our introduction, RV manufacturers and suppliers are developing electric zero-emission motorhomes, travel trailers, and generators/power systems. These units incorporate advanced drive train and battery packages that power not only the vehicle in transit but the living systems of the RV at campgrounds or boondocking locations. There is growing demand for tandem charging capabilities of electric tow-vehicles and electric RV trailers at parks and campgrounds. Additionally, as the country upgrades to tomorrow's standard of electric power, we encourage the Administration to continue to engage industry on technical needs to ensure EV charging stations are able to accommodate new RV industry and tow-vehicle technology.

**3. The \$5 billion state allocation can help address electrical grid issues and invest in park, forest, and rural EV infrastructure.** State and local infrastructure investments can grow renewable charging recreation corridors by capitalizing on existing electric charging networks and making vital new build/utility upgrade investments in and around our nation's public lands and campgrounds.

**4. Eligible entities for community grants must include publicly accessible parking facility projects owned or managed by a private entity.** Private campgrounds and RV dealerships are well positioned to supplement the Administration's needs for a robust and effective rural EV charging network. Grants to install dedicated EV charging stations would not only help promote environmentally friendly travel habits but also ensure all Americans have access to the great outdoors. If a public parking facility owned by a private entity is eligible to receive grants, private campgrounds, RV dealerships and connected parking facilities should be eligible as well. For example, charging program funds should be available to private campgrounds for the acquisition and installation of publicly accessible EV charging infrastructure, with that private entity paying the non-Federal share of the project cost.

**5. RVIA supports prioritization for community grant projects in rural areas and low- and moderate-income neighborhoods and communities.** RVIA strongly supports question 4 related to the need for publicly available EV charging infrastructure in rural corridors and underserved or disadvantaged communities. We are pleased the FHWA will consider the extent to which a project contributes to geographic diversity, including a balance between urban and rural communities. Outdoor recreation is the main driver of many rural economies. Campgrounds are the gateway to the outdoors. Campgrounds continually provide diverse Americans their first experience to the positive physical and mental health benefits that outdoor recreation provides. Robust and widely available rural EV charging infrastructure is necessary to accomplish the Administration's goals, and the EV charging program guidance should prioritize public lands, gateway communities, and public and private campgrounds in and around our national and state parks and forests as rural EV charging networks.

In short, our national and state parks support hundreds of thousands of private-sector jobs annually, and they contribute to the health and wellbeing of Americans. These facilities and the gateway communities that surround them are worthy of a robust EV charging infrastructure that accommodates the current and future RV traveler. We hope these comments will be an important part of your development of the EV charging program guidance. If you have questions or if RVIA can serve as a resource, please contact Chris Bornemann, Director of Federal Affairs, at [cbornemann@rvia.org](mailto:cbornemann@rvia.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Craig Kirby", with a large, stylized flourish at the end.

Craig A. Kirby  
President & CEO