The City of Cody endorses the Wyoming Department of Transportation's (WYDOT) request for location exceptions for National Electric Vehicle Infrastructure (NEVI) stations. Granting these exceptions will allow WYDOT to fund a holistic state electric vehicle (EV) program that better serves the greatest potential consumer base and supports City of Cody and Park County's tourism industry. Allowing these exceptions will provide residents and out-of-state visitors, who choose to embrace EV technology, a better opportunity to continue to visit our area.

WYDOT has carefully considered the competing aspects of NEVI program requirements and the fact that those requirements fall short in supporting statewide tourism. WYDOT's analysis suggested that the saturation of Wyoming's alternative fuel corridors (Interstates 80, 25, and 90) would not fully support movement of travelers to most of the tourist areas including Cody and Park County and the state's leading tourism attraction, Yellowstone National Park. In addition, WYDOT was concerned that lack of adequate corridor traffic to support EV station economics would endanger the ability of the stations to remain in business long enough to remain operational while EV market share increases. WYDOT proposed reducing the number of stations along the corridors and shifting the funding to sites that allow travelers to reach tourist destinations. We agree with WYDOT's assessment.

WYDOT's work with the National Park Service's data clearly indicates that significant potential exists for EV traffic movement to and from National Parks. The City of Cody serves as both a destination and a jump off point for travelers seeking nearby tourist attractions of Yellowstone, Grand Teton National Park and the Shoshone National Forest.. Allowing WYDOT to reduce station density along corridors and utilize funding to get EVs from corridors to these tourist areas will support the entire state's economy. The City of Cody respectfully requests that the Federal Highway Administration favorably consider WYDOT's NEVI plan and the exceptions to location requirements including:

- 1. Exception to the 50-mile rule along the alternative fuel corridors where location of an additional station is not supported by population, amenities, or creates excessive economic challenges due station saturation without enough visits to support location economics.
- 2. Exception to the 1 mile from the interstate exit where adequate charging capability is planned or exists and additional stations would create greater economic challenges for long-term station financial viability.

Shifting funds from corridor stations to routes that enable tourist movement provides a better economic environment for the overall EV infrastructure network. It will also specifically enhance the City of Cody's ability to provide adequate travel support to anyone who chooses to use EV technology. Cody, along with officials and businesses from other jurisdictions have already produced a plan to build out infrastructure from Interstate 25 to Yellowstone and Teton Parks and may be a direct beneficiary of these exceptions if approved. Please provide WYDOT your support for their statewide plan.

Sincerely,

Matt Hall, Mayor of the City of Cody

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