

From: [Duvall, Ron](#)
To: [Regynski, Barb](#)
Cc: [Walsh, Brian](#); [Smith, Kim \(DENR\)](#)
Subject: FW: [EXT] ATTEN: Barb Regynski
Date: Thursday, June 07, 2018 3:54:16 PM
Attachments: [ATT00001.htm](#)
[South Dakota BMP SemaConnecty comments 2018-06-07.pdf](#)
[ATT00002.htm](#)

Barb, for you...

NOTE: When replying to this email do NOT click the person's [\[mailto:myname@email.com\]](mailto:myname@email.com) address since this may result in your reply being undeliverable. Either copy and paste just the email address (e.g. myname@email.com) or type just the address into your reply message.

From: Josh Cohen [<mailto:josh.cohen@semaconnect.com>]
Sent: Thursday, June 07, 2018 3:50 PM
To: DENR INTERNET INFORMATION
Subject: [EXT] ATTEN: Barb Regynski

Dear Ms. Regynski:

On behalf of SemaConnect, a leading provider of Level 2 charging stations, I respectfully submit the attached comments on South Dakota's draft VW Beneficiary Mitigation Plan.

Please confirm receipt of the document, and please advise if you have any questions or if I can provide additional information.

Sincerely,
Josh Cohen

--

Josh Cohen | *Head - Public Programs*

SemaConnect Inc | 4961 Tesla Drive | Bowie, Maryland 20715

p 301.352.3730 |

c 410.991.5674 |

f. 301.352.4232 | e josh.cohen@semaconnect.com

June 7, 2018

South Dakota Department of Environment & Natural Resources
Attn: Barb Regynski

Via Email: DENRINTERNET@state.sd.us

RE: SemaConnect Comments on South Dakota's Draft VW Beneficiary Mitigation Plan

Dear Ms. Regynski:

SemaConnect respectfully submits the following recommendation in response to the Department of Environment & Natural Resources' invitation for public comment on the Draft [Volkswagen \(VW\) Beneficiary Mitigation Plan \(BMP\)](#).

Recommendation

- **Increase the allocation for light duty electric vehicle (EV) charging infrastructure from the proposed 5% to the maximum 15% allowable**

In 2016, transportation [dethroned](#) electricity generation to claim the dubious distinction as the highest polluting sector in our economy. In fact, transportation was the only consumption sector where carbon emissions increased. It now accounts for more than one-fourth of all U.S. greenhouse gas (GHG) emissions. In South Dakota, that percentage is even higher: the most recent data [shows](#) that transportation accounts for a staggering 48% of all carbon emissions statewide.

Electrification of transportation is essential to decarbonize our transportation sector and achieve cleaner, healthier air because EVs emit far less pollution than gas-powered vehicles. A recent Union of Concerned Scientists (UCS) report [confirmed](#) that even after taking into account EVs' more electricity-intensive manufacturing process, battery electric vehicles (BEVs) produce less than half the GHG emissions as comparable gas-fueled cars over their full life cycle.

South Dakota's draft report states, "light duty zero emission vehicle supply equipment, does not appear to be cost effective in reducing nitrogen oxide emissions in South Dakota because of the lack of electric vehicles" (page 23). SemaConnect respectfully disagrees with this conclusion. In fact, we believe the opposite to be true: charging infrastructure is the *sine qua non*—the essential ingredient—necessary to move EV adoption beyond the early adopters and into the mainstream. Drivers of gas vehicles take for granted their ability to fuel up wherever they go, because gas stations have spread like wildfire since the first "filling station" opened in Pittsburgh in 1905. On the other hand, publicly accessible

EV charging infrastructure is not readily available outside of a handful of markets. This “relative lack of charging infrastructure” holds back widespread adoption of EVs, [according to](#) the Financial Times. Indeed, the International Energy Administration (IEA) [reports](#):

“Charging infrastructure, whether at home, at work or at public locations, is indispensable for operating EVs... *the availability of chargers [is] one of the key factors for contributing to the market penetration of EVs.*” (emphasis added)

In South Dakota, the need for more public charging stations is clear. [According to](#) the U.S. Department of Energy’s Alternative Fuels Data Center, South Dakota currently has only 19 publicly accessible stations statewide with a total of 29 Level 2 charging outlets. Given this lack of publicly-available charging infrastructure, a firm commitment to allocate the maximum allowable amount will send a clear signal to the market and help accelerate the electrification of transportation across the state.

For these reasons, SemaConnect respectfully recommends that South Dakota increase its recommended allocation for light-duty EV infrastructure from approximately 5% to the maximum allowable 15%.

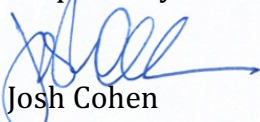
About SemaConnect

SemaConnect is the leading provider of electric vehicle (EV) amenities to the North American commercial and residential property market. We are a proven partner to premier properties across the nation and have built trusted relationships with some of the most well-known commercial brands in the building space such as CBRE, JLL, Hines, Greystar, Cisco Systems and Standard Parking. With gorgeously-designed stations, smart engineering and software controls to maximize uptime, and a truly open user network with robust tools for measuring and collecting valuable data, property owners, managers and clientele can realize unsurpassed value with SemaConnect’s EV solutions.

SemaConnect is American-owned and we design, assemble and distribute all of our products at our headquarters in Maryland.

Thank you for this opportunity to offer input, and for your consideration in this important matter. If SemaConnect can provide additional information about its products or otherwise be helpful, please do not hesitate to contact me directly at josh.cohen@semaconnect.com.

Respectfully submitted,



Josh Cohen
Head – Public Programs