

From: Allie Wurtz
To: [DENR INTERNET INFORMATION; Regynski, Barb](#)
Subject: [EXT] ATTN: Barb Regynski VW Mitigation Plan Comment
Date: Thursday, May 10, 2018 5:43:01 AM
Attachments: [VW_Tier4Diesel_Infographic_Switch_Final.pdf](#)
[image003.png](#)

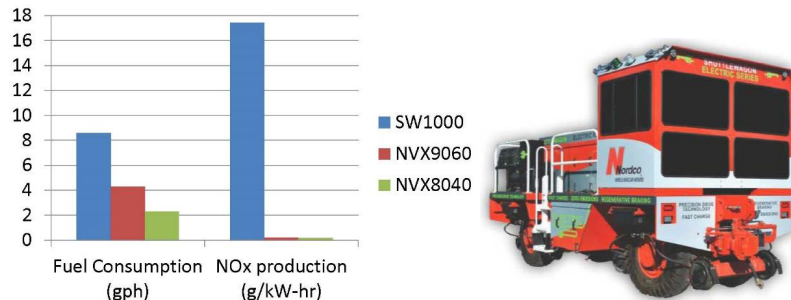
Freight Switcher Locomotives are the easiest and most economical way for South Dakota to meet its air quality goals in regards to the VW Mitigation Settlement. Please consider allocating at least 1/8th of your funding towards freight switcher locomotive projects as they are **the most cost-effective per dollar spent per tons of NOx reduced**. The attached document demonstrates the cost effectiveness in detail.

In addition, please consider all - electric rail car movers, as referenced on pages 24-26 in the NASEO Toolkit (link below), as an eligible mitigation action under the category of freight switcher.

<https://www.naseo.org/Data/Sites/1/naseo-vw-beneficiary-mitigation-plan-toolkit-final.pdf>

Recently, hybrid and all-electric mobile railcar movers have been introduced into the North American market. These railcar movers can work both on and off of railroad tracks and are available in all-electric and hybrid-electric models. Figure 10 illustrates fuel consumption and NOX emissions from two hybrid- electric railcar movers compared to an older diesel switcher.

Figure 10: Hybrid-Electric Fuel Consumption and Emissions Compared to Older Diesel Switcher⁶⁸ (SW1000: Conventional diesel; NVX9060: hybrid; NVX8040: all-electric)⁶⁹



Thanks for your consideration and I assure you that there are interested operators who would appreciate the opportunity to be considered for funding.

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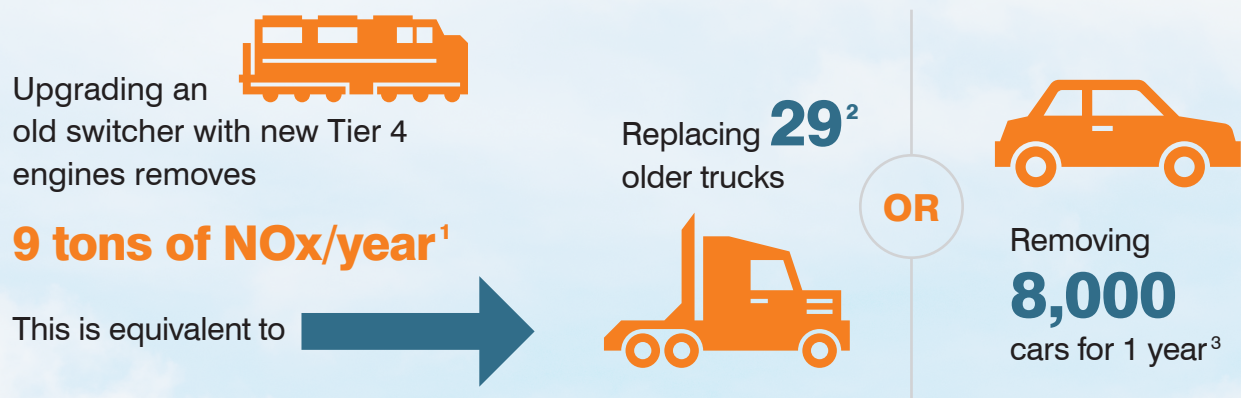


The most cost-effective upgrades make the biggest health impact

New Tier 4 engines for switchers reduce NOx emissions by 95%

The \$2.9 billion VW Environmental Mitigation Trust provides funding to upgrade older vehicles and equipment to rapidly reduce nitrogen oxide (NOx) emissions, which contribute to hazardous smog pollution. Upgrading just one of the oldest, dirtiest switchers is like taking tens of thousands

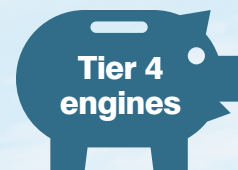
of passenger vehicles off the road per year, bringing substantial health benefits to at-risk communities. With states now deciding how to invest these funds, repowering these older switchers with cleaner Tier 4 engines is a game-changer for delivering immediate and cost-effective air quality benefits.



Upgrading old engines means cleaner air for all

EPA estimates that by 2020, only 5% of switcher engines will be replaced with cleaner Tier 4 engines. The VW Environmental Mitigation Trust provides a rare opportunity to retire the oldest diesel engines still in operation, which can last 70 years or longer. Tier 4 engines will deliver cleaner, healthier air faster to at-risk communities. These new engines also improve fuel efficiency, which reduces CO₂ and black carbon emissions, two important greenhouse gas pollutants.

Switcher projects are a better value



1 ton of NOx reduction costs



1. Ramboll, 2018, Emission reductions and cost effectiveness for marine and locomotive projects
2. EPA, 2016, National Port Strategy Assessment

3. Tier 2 car driven 15,000 miles per year
4. FHWA, 2015 CMAQ Cost-Effectiveness Report