February 19, 2018

The Honorable Bryan W. Shaw
Texas Commission on Environmental Quality
12100 Park 35 Circle
Austin, Texas 78753

Chairman Shaw:

As the beneficiary agency for Texas recipients of the Volkswagen Settlement Environmental Mitigation Trust Fund ("VW Settlement"), the Texas Commission on Environmental Quality will make important decisions on how to best administer the funds in a manner that would have the most positive impact. The City of Houston ("Houston") intends to seek to become a recipient of these funds. On behalf of Houston, I would like to submit to you our comments on this matter for your consideration.

Houston fully supports the goal of reducing diesel vehicle emissions, especially within the Houston-Galveston-Brazoria eight-county non-attainment region. Houston has more than 1,000 older, diesel-fueled on-road vehicles in its fleet. Replacement of older, high emission diesel vehicles with new, cleaner diesel or alternative fuel vehicles will help the region achieve this goal. Both methods will provide the Houston and the greater Houston-Galveston-Brazoria ozone non-attainment region with reductions in NOx emissions, a precursor to ozone, and reductions in diesel particulate matter. Both ozone and particulates are recognized health hazards.

Many governmental entities along the Gulf Coast of Texas incurred significant costs associated with damages from Hurricane Harvey and related catastrophic flooding. These costs have financially strapped local governments such as Houston and have prevented these entities from being able to fully participate in existing emissions reduction programs, such as TERP and DEERA, which require a local government cost matching component. In addition, many of these governmental entities, including Houston, lost vehicles and equipment during the Hurricane Harvey floods. Many of these were diesel fueled vehicles that were used as critical emergency response vehicles to rescue citizens in distress (fire trucks, dump trucks, etc.). Use of these settlement funds to enable government agencies to procure the full replacement cost of its fleet vehicles, with no cost matching component, will enable these agencies to maximize benefit, and related emissions reductions, from the VW Settlement.

Council Members: Brenda Stardig Jerry Davis Ellen R. Cohen Dwight A. Boykins Dave Martin Steve Le Greg Travis Karla Cisneros Robert Gallegos Mike Laster Larry V. Green Mike Knox David W. Robinson Michael Kubosh Amanda Edwards Jack Christie Controller: Chris Brown
Houston places special emphasis on allowing local governments to receive 100 percent of VW Settlement funds without requiring additional cost share as allowed in the federal consent decree. Enacting this principle will provide maximum impact and assist Houston in its recovery.

I thank you for your consideration of Houston’s comments on this important decision.

Sincerely,

[Signature]

Sylvester Turner
Mayor