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**Subject:** Volkswagen Settlement DFW Airport Comments  
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**Attachments:** [TCEQ Commissioner Meeting - VW Comments.pdf](#)

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Commissioner Niermann,

Dallas Fort Worth International Airport would like to thank Commissioner Niermann and the Texas Commission on Environmental Quality for the opportunity to comment on the plan for the distribution of the Volkswagen Settlement Environmental Mitigation Trust in Texas.

DFW Airport is the fourth busiest airport in the world, welcoming more than 66 million customers along their journey every year. As the only carbon neutral airport in the Americas, and largest carbon neutral airport in the world, DFW is dedicated to reducing emissions and improving local air quality. DFW recognizes the Volkswagen Settlement as an opportunity to improve sustainability at our airport. Please see the attached comments on behalf of Dallas Fort Worth International Airport.

Thank you,  
Emily

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# DFW Airport Comments

## **Minimize funding for administrative costs**

The Volkswagen Environmental Mitigation Trust should be spent to the greatest extent practical on investing in projects which will reduce emissions and improve regional air quality.

## **Streamline reporting requirements**

Extensive reporting requirements will drive administrative costs for the TCEQ and funding recipient. Focus reporting requirements on demonstrating successful project implementation. Minimize reporting during the operational phase of the project.

## **Keep VW Trust funding separate from existing TERP Grant Programs**

While both provide funding for reducing emissions from vehicles and equipment, Volkswagen Environmental Mitigation trust will expand funding opportunities for projects not eligible for TERP or that exceed available funding.

## **Avoid additional requirements for eligible mitigation actions**

The Department of Justice defined the eligible mitigation actions and mitigation action expenditures in the consent decree. TCEQ would limit eligible projects by adding requirements to the mitigation actions and expenditures such as further limiting the model years, or requiring replacement with specific fuel technologies.

## **Allocate funding based on ozone non-attainment regions**

This approach allows the funding to be spent in regions with the greatest air quality concerns.

## **Prioritize cost effective projects**

Projects which reduce the most NO<sub>x</sub> emissions per dollar should be prioritized to achieve the greatest benefit to Texas air quality, while still respecting the regional allocations.

## **Ensure a balanced approach when allocating funding by category and by technology**

Funding allocations by mitigation action category and technology should be based on project demand to address the real needs of Texas operators. Each region will have a different proportion of project types. For example, Houston will have more marine shorepower opportunities than Dallas-Fort Worth.

## **Apportion funding for light-duty electric vehicle supply equipment (EVSE)**

EVSE is critical to enabling a self-sustaining market for alternative fuel vehicles, and provides the foundation for decoupling emissions from regional growth.

## **Accept EPA DERA funding to enable the DERA Option**

Diesel Emissions Reduction Act (DERA) enables additional project types that are very valuable to port facilities and would take advantage of existing funding to increase the environmental impact of the VW Trust. In the case of DFW Airport, replacing diesel ground power units with new, clean diesel equipment would be eligible under DERA.