June 28, 2018

Commissioner Jon Niermann
Texas Commission on Environmental Quality
Air Quality Division
Implementation Grants Section, MC-204
PO Box 13087
Austin, TX 78711-3087

Re: Volkswagen Settlement

Dear Commissioner Niermann:

Arlington Independent School District (AISD) would like to thank Commissioner Niermann and the Texas Commission on Environmental Quality (TCEQ) for the opportunity to comment on the Beneficiary Mitigation Plan for Texas and the use of Trust funds.

Located in the heart of the Dallas-Fort Worth Metroplex, AISD educates and is responsible for the daily well-being of approximately 61,000 students on 76 school campuses. AISD currently utilizes a mix of over 300 propane and diesel school vehicles to meet the needs of students and staff – traveling a cumulative average of more than 5 million miles each school year. The district is dedicated to reducing our carbon footprint/NOx emissions, and improving local air quality for students and the community by improving our fleet with safer and more efficient vehicles.

Recommendations:

- **Address excess NOx emissions** – Class 4-8 School Bus/Shuttle Bus and/or Transit Bus replacements or purchase should be considered the highest priority for use of the Environmental Mitigation Trust funds.

- **Benefit residents in areas with the greatest need** - The Dallas-Fort Worth region has the highest percentage (25%) of VW-affected vehicles in the state, according to Chris Wolfe of the Environment Defense Fund (January 17, 2018).

- **Keep Trust funding separate from existing TERP grant programs** – while both provide funding for reducing emissions from vehicles and equipment, the Trust will expand funding opportunities for projects not eligible for TERP or that exceed available funding.

AISD supports Texas’ transition to a better air quality future with the purchase and deployment of clean school buses as the planning process moves forward.

Sincerely,

[Signature]

Dr. Marcelo Cavazos
Superintendent

Office of Superintendent
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