

From: Conner, Michael [REDACTED]
Sent: Monday, September 17, 2018 1:59 PM
To: VWSettle
Subject: RE: VW Clearinghouse

Thanks Jessica!!!

Dear TCEQ:

After reading over your draft Texas VW Mitigation Plan, I have a comment regarding the percentages being allocated to various regions of the State. While it is admirable to allocate a large percentage of funds to those areas of Texas that are designated as nonattainment areas, given the extremely large amount of the overall grant to the State of Texas by the VW Environmental Mitigation Trust, I think one of two things should occur. 1) designate a slightly lower percentage to the nonattainment areas; or 2) designate a significant total amount to airports in other than nonattainment areas. Since the Mitigation Trust obviously sees airports as large quantity pollution generators and has graciously called out airports specifically in the grant, it makes sense to ensure that airports in other than the nonattainment areas have the ability to obtain a significant amount of the grant.

Airports in the nonattainment areas are generally very large airports and can afford to do very large environmental mitigation projects without a grant. Airports throughout the State of Texas that are not in nonattainment areas are generally smaller airports and can rarely afford to do environmental mitigation projects of any significant size. While it is very difficult for the smaller airports to be heard because they generally have less political power and generally represent smaller local populations, this does not mean that they are any less important from an environmental standpoint. A ton of pollution in a small town is the same as a ton of pollution in a large town. Even so, the ability of small airports to provide the required 40% matching funds may be difficult to achieve. If there were some way for that matching percentage to be lower, that would help smaller airports (and the smaller communities that are the sponsors or owners of those airports) achieve the overall environmental mitigation goals of the VW grant.

If there is no way to make the above changes to the Texas plan, then one other suggestion would be to give some higher level of consideration to smaller airports (less than 1 million annual enplanements) when awarding the grant funds. That way, any airport that is serious enough about environmental mitigation and can muster the 40% match will at least have a chance at obtaining the VW grant funds. I don't know how that could possibly be communicated in the mitigation plan, but it might help.

I sincerely hope you will take these things into consideration regarding the VW Mitigation Plan for the great State of Texas. Thank you!

Sincerely,



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