
From: Martin Gutierrez
Sent: Friday, September 21, 2018 4:28 PM
To: VWSettle
Subject: San Antonio Chamber of Commerce Public Comments on the Draft Beneficiary Mitigation Plan for Texas
Attachments: SA Chamber VW Public Comments_Draft.pdf



September 21, 2018

Texas Commission on Environmental Quality
Air Quality Division
Implementation Grants Section, MC-204
P.O. Box 13087 Austin, TX 78711-3087

RE: Comments pertaining to the use of the Volkswagen Environmental Mitigation Trust Funds in Texas and the development of a state Beneficiary, Mitigation Plan

Dear Commissioner Niermann:

As you know, on July 18, 2018, the Environmental Protection Agency designated Bexar County as a “nonattainment” area under the new federal air quality standards passed in 2015 (the “NAAQS”).

This was an especially devastating blow to a low-income community like San Antonio, where the designation is expected to result in an economic loss of \$3.2 billion and \$27.5 billion according to the 2017 study “Potential Costs of Nonattainment Designation for the San Antonio Region” conducted by the Alamo Area Council of Governments.

What made the designation feel particularly unjust as well was that San Antonio has a better track record than any other major metropolitan area of voluntarily complying with new air quality standards. Twice before Bexar County has been in danger of running afoul of the NAAQS when such standards were first lowered to 80 and then 75 ppb. Each time, Bexar County brought ozone levels into compliance, despite the fact as well that only 20% of ozone emissions in Bexar County are from local sources. In fact, Bexar County has reduced ozone levels over the last twenty years from 93 ppb in 2003 to 73 ppb in 2016.

The silver lining, however, is that Bexar County – because of its track record and because of the marginal nature of its nonattainment – has a real chance of getting *out* of nonattainment by 2021. The proposed allocation of \$73.5 million to Bexar County to reduce the nitrogen oxides in the environment in Bexar County might just be the measure that tips the scales.

A \$73.5 million dollar measure that averts \$3.2 - \$27.5 billion in economic losses to one of the fastest-growing metropolitan areas in the state ought to be a financial and political no-brainer. We, at least, have not heard of a more compelling way to invest the Volkswagen funds anywhere in the state that would achieve a higher return on investment.

Further, in Bexar County, the Volkswagen monies would complement a range of other efforts that the community has undertaken to voluntarily reduce emissions:

- Its municipally-owned utility, CPS Energy, now leads the state in solar generation and is one of the largest buyers of wind-generated electricity in the nation;
- CPS has also closed several local coal-fired power plants;
- VIA Metropolitan Transit has transitioned half of its fleet to cleaner-burning compressed natural gas;
- Three of San Antonio's largest manufacturers (Toyota, Buzzi Unicem, and Alamo Cement) have all voluntarily sought and achieved ENERGY STAR certifications

All of the above taken in combination with Bexar County's unique track record of working as a community to improve its air quality make our community the most impactful place to invest the Volkswagen funds.

Additionally, we support the Alamo Area Council of Government's recommendations dated March 28, 2018 for the use of these funds. Given Bexar County's diverse and successful emissions reduction programs over the years - we support flexibility and local discretion in how such funds are allocated, as well as the ability to share funds between over and under-subscribed programs. As technology advances, such flexibility is an important way to ensure that funding continues to go where it can be most impactful.

Sincerely,



Brandon Seale
Chair, Energy and Sustainability Committee
San Antonio Chamber of Commerce

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