September 25, 2018

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

To Whom It May Concern:

North East ISD (NEISD) appreciates the opportunity to provide comments on the Texas Commission on Environmental Quality’s (TCEQ) Texas Volkswagen Environmental Mitigation Plan. These funds provide an important opportunity to lower nitrogen oxides in our environment.

1. Maintain the targeted allocation for San Antonio
NEISD is the second largest school district in the San Antonio area and tenth largest in the state. We support the allocations designated for the San Antonio area in the draft Beneficiary Mitigation Plan. Our city and the Alamo Area Council of Governments are ready to act on improving air quality. AACOG administers the Alamo Area Clean Cities Coalition and is committed to getting Bexar County out of nonattainment status as soon as possible. Area school districts, like NEISD, are well prepared to support these efforts.

2. Empower regional Councils of Governments to administer funds
A first-come, first-serve approach to awarding grant funds may not result in the best projects being funded. COGs have a close connection to local communities and can best prioritize needs fairly and efficiently.

3. Do not limit funding amounts for school districts
NEISD already has a replacement schedule for our bus fleet. We have identified 16 buses with model years of 2006 to 2009, which would benefit from upgrades utilizing the VW settlement funds. Our buses travel over two million miles per year in a 144 square mile service area in Bexar County. A limit of $500,000 on school district would only fund five out of the 16 identified in NEISD.

Thank you for your thoughtful consideration of our comments. I am confident that the San Antonio area will make an immediate positive impact on air quality by using the VW settlement funds.

Sincerely,

Brian G. Gottardy, Ed.D.
Superintendent of Schools