



CITY OF SAN ANTONIO

RON NIRENBERG
MAYOR

September 28, 2018

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

ATTN: VW Settlement

Re: Comments pertaining to the Volkswagen Environmental Mitigation Trust Draft
Beneficiary Mitigation Plan for Texas

Dear Commissioner Niermann:

We wish to express our gratitude and strong support for the Texas Commission on Environmental Quality's (TCEQ) Draft Beneficiary Mitigation Plan for Texas under the Volkswagen State Environmental Mitigation Trust. The San Antonio community is in a unique position among nonattainment areas to utilize the VW funds to move the needle on air quality to meet the federal standards in the near term, and we appreciate the Commission's recognition of this urgency and opportunity.

As you know, Bexar County is now in marginal nonattainment of the 2015 Ozone National Ambient Air Quality Standards (NAAQS), and must meet the standard within three years to avoid additional regulations that would undoubtedly impact our economy. In the most recent measurements for 2018, the first of the three years that will be averaged, San Antonio currently stands only 2 ppb over the ozone standard. Therefore, with continued focus, technological innovation and this funding opportunity, the region is in an excellent position to meet the federally-mandated NAAQS for ground level ozone within a few years.

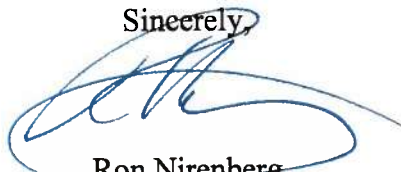
Crucial to taking meaningful steps to improve air quality is coordination with the numerous regional stakeholders. We are working closely with local partners including Bexar County, Alamo Area Council of Governments, independent school districts, VIA Metropolitan Transit, and CPS Energy to identify and prepare actions steps that will reduce NOx emissions, minimize

pollutant exposure to residents, and invest in programs and infrastructure that support the use of Zero Emission Vehicles (ZEV.)

The City of San Antonio's multi-disciplined Air Quality Task Force is focused on public health, environmental sustainability and best practices in transportation, land use, energy and the built environment, and we have propelled our mitigation activities into high gear. Air Quality is also a fundamental tenet of the recently adopted SA Sustainability Plan and the Climate Action & Adaption Plan, currently in progress. The City of San Antonio, as well as business and institutional partners, have a number of currently planned transformational projects that will benefit from this funding opportunity, including school bus purchasing and replacement, medium and heavy-duty vehicle replace/repower and airport ground service equipment electrification. Additionally, through our Metropolitan Health District and Office of Military and Veterans Affairs we are engaged with Joint Base San Antonio to assist with their conformity requirements under nonattainment through the VW mitigation trust, local and federal support.

Finally, we understand that TCEQ has received comments recommending lowering or eliminating the local match for governmental entities. This would be particularly helpful to our region given the tight timeline we are under to meet the federal standard. Such changes would allow our region to avoid budget-cycle delays for match allocations to take advantage of funds and quickly implement projects within our two year deadline.

Sincerely,



Ron Nirenberg
MAYOR