



**COLLIN
COUNTY**

Commissioners Court
Jack Hatchell Administrative Building
2300 Bloomdale
Suite 4192
McKinney, Tx 75071

October 1, 2018

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

Re: Collin Count concerns relating to TCEQ's *Volkswagen* Settlement Draft Beneficiary Mitigation Plan

Chairman Niermann:

Collin County appreciates the work of the Texas Commission on Environmental Quality in developing the Draft Beneficiary Mitigation Plan ("Plan") for Texas' portion of the VW Settlement. However, after reviewing the Plan, Collin County has major concerns about the way the \$209 million of settlement funds are proposed to be distributed throughout the state.

The Dallas – Fort Worth (DFW) region is home to 33% of the vehicles affected by VW's decision to skirt emissions regulations. In addition, DFW has been designated nonattainment for both 2008 and 2015 ozone standards.

Under the proposed Plan, the DFW region will be allocated 13.91% of the settlement funds, while the number of registered VW violating vehicles in the DFW region equals approximately 33% of the total registered violating VW vehicles in the State, and DFW's population represents approximately 36 % of the State's total population.

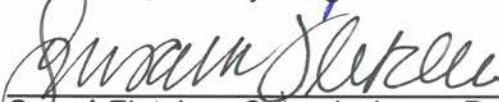
By comparison, the San Antonio area has only 6,877 affected vehicles, yet under the Plan they are slated to receive a disproportionate 35% of funds (\$73M) – more than the more populous regions of DFW (\$29M) and Houston (\$27M) combined. Mobile sources only account for 58% of the NOx emissions in San Antonio, further diluting the impact of VW funds in the region.

We urge you to reconsider the proposed allocation structure to bring it more in line with a proportionate distribution based on population and number of affected vehicles. We feel this will give Texans "more bang for our buck" and lead to bigger reductions in NOx emissions statewide, which is the ultimate goal of the VW Settlement.

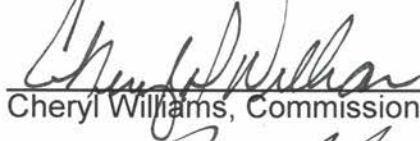
Sincerely,



Keith Self, County Judge



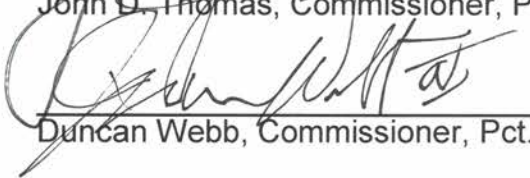
Susan Fletcher, Commissioner, Pct. 1



Cheryl Williams, Commissioner, Pct. 2



John D. Thomas, Commissioner, Pct. 3



Duncan Webb, Commissioner, Pct. 4