

RE: Comments on VW Settlement Fund and TCEQ Air Quality Measures for Bexar County

I am Dr. Meredith McGuire, recently retired full Professor at Trinity University, where I taught several undergraduate pre-professional courses on Health and the Environment. I am also the co-author of a major textbook in the field of Medical Sociology, in addition to scholarly journal articles and professional papers.

The science underlying stricter ozone limits is clear and compelling; indeed, the Obama EPA regulations should have been even stronger -- for the sake of children's health. I fully support the new non-attainment designation of Bexar County, because we have not improved our air quality quickly and thoroughly enough. In addition to ozone pollution, many residents suffer from diesel particulate matter and from airborne toxic chemicals. Those same chemicals are also sources of greenhouse gas emissions, increasing the impacts of Climate Change – impacts that will disproportionately hurt the Texas economy and the people's quality of life. I'm very grateful to the State of California and the Obama EPA for discovering and convicting Volkswagen for its corporate malfeasance in producing diesel vehicles with higher than allowed NOx emissions and covering up that fact.

VW Settlement funds will certainly help Texas improve our air quality. I strongly support TCEQ's general plans for handling this "windfall":

- I support plans to administer the funds directly through TCEQ rather than using MPO or COG intermediaries. We don't need another layer of bureaucracy and delay.
- I also enthusiastically support the plan to spend the full maximum 15% on EV infrastructure. Expanding charging infrastructure will be a huge help for EV adoption. We need this to be done statewide. Rapid transition to electric vehicles is critical for addressing Climate Change. Other plausible technologies are not "ready" enough to implement now.
- I urge TCEQ to make a specific minimum commitment to electric school buses and transit buses by setting aside at least \$30 million of the total for all-electric buses so that those most impacted by air pollution will receive a greater benefit. Please consider raising the 60% reimbursement for these types of public vehicles to at least 80%, so underfunded school districts and low-income communities can benefit fully. None of these funds should be used for any "alternative fuels" that result in any carbon emissions. Any proposals for such purposes to be considered by TCEQ in its "fuel-neutral approach" should apply *complete life cycle analysis* in their evaluation.
- I am in favor of the separate category inclusions of refuse vehicles, freight trucks and airport equipment.
- I am especially disappointed that the Draft Mitigation Plan has no mention of environmental justice. Low-income urban and near-urban communities are being disproportionately affected by Texas air quality problems, so it would be appropriate to commit 25% of the VW Settlement Charging Funds (the 15% of the total) for support of multi-family and public housing facilities in low-income communities.
- TCEQ for our area will prioritize comments from AACOG, but also should prioritize comments from AAMPO, Bexar County and *most importantly CoSA (City of San Antonio)*. Only COSA is in the midst of developing a Climate Action Plan for which EV infrastructure, in current planning with CPS Energy, will be a critical component. COSA already is moving

aggressively to improve air quality, limit idling, upgrade government vehicle fleets, reduce CPS emissions etc.

- I firmly agree with TCEQ that these funds should NOT be used for business economic development, but rather “to implement the grant projects quickly and efficiently to hasten the air quality benefits”

I'm hopeful we can accomplish rapid and substantial air quality improvements in Texas thanks to this EPA agreement resulting from the culpability of a large international corporation. Our system works best when people, corporations and governments all work honestly in a level playing field, and when they don't, prosecution and maximum penalties are assessed to send a clear message that malfeasance will not be tolerated.

Thanks for considering my comments. I care deeply about this issue and hope that you do too.

Sincerely, Dr. Meredith McGuire