



October 8, 2018

Texas Commission On Environmental Quality
Air Quality Division
P.O. Box 13087
Austin, Texas 78711-3087

RE: Texas Volkswagen Environmental Mitigation Plan

To Whom It May Concern,

The Texas Association of School Administrators (TASA), the Texas Association of School Boards (TASB), and the Texas Association of School Business Officials (TASBO) are respectfully submitting comments on the *Draft Beneficiary Mitigation Plan for Texas* (“Mitigation Plan” or “Plan”). The Mitigation Plan will serve as Texas’ framework in accordance with the Volkswagen Environmental Mitigation Trust Agreement for the allocation of more than \$209 million to reduce nitrogen oxides (NO₂) in the environment. The high level of grant funding associated with the Mitigation Plan and the important policy goal of reducing NO₂ emissions require us to get this Plan right. By and large, those who have been involved in the drafting of this plan have hit the mark and should be commended.

Still, we believe that this plan can be further improved in two significant ways. First, the plan proposes the possibility of funding for school buses provided that 51% or more of the bus’ annual mileage occurs in designated counties that are grouped in five “priority areas.”¹ Of course, we all know that NO₂ emissions do not respect map boundaries, and as almost 40% of Texas students attend school in a county outside of the priority areas, we would like to recommend that grant funds be available for buses outside of the priority area.

Second, the Plan generally contemplates that the applicant for grants will be a “single” applicant. For example, the Plan describes calculators for use by the applicant to calculate reductions in NO₂ emissions, or the applicant providing cost-effectiveness metrics based on TCEQ established criteria, or that grant contracts between the TCEQ and the applicant. However, school districts create operational and pricing efficiencies, particularly in large purchases like buses, by banding together, usually by use of a purchasing coop or a shared services agreement (SSA) as their agent. Please consider broadening the plan in a way that would clearly allow a coop or an SSA to act on behalf of multiple districts in applying for grant funding and for providing any data/metrics needed in the application process or as required by the grant contract, if awarded. We think everyone is better served if school districts are not competing against each other, but rather are collaborating to make each purchasing dollar go as far as possible.

¹ San Antonio, Dallas-Fort Worth, Houston-Galveston-Brazoria, El Paso, and Beaumont-Port Arthur



We appreciate the opportunity to comment on the Mitigation Plan. Please feel free to contact any of us to provide additional information as is helpful.

Sincerely,

A handwritten signature in black ink, appearing to read 'Amy Beneski'.

Amy Beneski

Texas Association of School Administrators

A handwritten signature in black ink, appearing to read 'Grover Campbell'.

Grover Campbell

Texas Association of School Boards

A handwritten signature in black ink, appearing to read 'Tracy Ginsberg'.

Tracy Ginsberg

Texas Association of School Business Officials