



October 2, 2018

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

Re: Dallas/Fort Worth's share of the *Volkswagen* Settlement Draft Beneficiary Mitigation Plan

Chairman Niermann:

The North Texas Commission believes funds from the VW Settlement should be directed toward populous communities, where most of the affected vehicles are used, and that have the most acute air quality issues. 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 in both the 2008 and 2015 ozone standards.

Under the proposed plan, the DFW region has been allocated 13.91% of available funding. With over 21,000 vehicles that could be eligible under the VW Settlement, the North Central Texas Council of Governments estimates that more than \$782 million is needed to replace or repower those vehicles so they emit less NOx. The \$29 million proposed under the Draft Beneficiary Mitigation plan would fund only 4% of the identified need.

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 lead to bigger reductions in NOx emissions statewide, which is the ultimate goal of the VW Settlement. Thank you for your consideration and for your service to our great state.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris E. Wallace".

Chris E. Wallace
President /CEO

cc: Commissioner Lindley

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Implementation Grants

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