October 8, 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 Use of Volkswagen Mitigation Trust Funds in Texas and the Development of a Final State Beneficiary Mitigation Plan

Dear Chairman Niermann:

We are writing on behalf of the City of Sugar Land (City) and would like to thank you for the opportunity to provide you with Sugar Land’s comments pertaining to the use of Volkswagen Mitigation Trust Funds.

Sugar Land strongly recommends that the Texas Commission on Environmental Quality (TCEQ) disperse the state Settlement allocation based on the percentage of affected vehicles found within the “priority regions.” This would increase funding to the Houston-Galveston region from $27 to $50 million. Air pollution in our area is a concern of residents of our region, particularly the elderly, very young and those with impaired respiratory health. The region’s non-attainment status is also a challenge to our continued economic competitiveness. We believe there is a need for significant emissions reductions which could result from the projects deployed with the Volkswagen Settlement funds. Other areas of the state impacted by the transport of emissions from our area will see air quality improvement as well.

For governmental recipients, Sugar Land recommends an increase in the proposed maximum funding percentage from 60 percent to at least 80 percent, which will accelerate and expand local government participation in Settlement funded activities.

Sugar Land recommends that Settlement funds be dispersed in our region through the Houston-Galveston Area Council (H-GAC) which has significant experience in similar programs.
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Doing so will ensure local priorities for effective emissions reductions are achieved without significant start-up time or an undue increase in administrative costs by TCEQ or local governments. H-GAC will also seek to leverage VW settlement projects with clean air funding from other sources to increase program effectiveness and accelerate deployment of available funds.

Sugar Land believes that TCEQ’s leadership along with the above recommendations will enhance our region’s ability to mitigate the damage caused by Volkswagen’s fraudulent activities and leverage ongoing efforts to improve air quality and public health.

Thank you for the opportunity to comment on this initiative.

Sincerely,

[Signature]

Joe R. Zimmerman
Mayor

cc: Mr. Toby Baker, Executive Director, MC 109
Ms. Stephanie Bergeron Perdue, Deputy Executive Director, MC 109
Ms. Dana Evans, Acting Director Environmental Assistance Division, MC 108
Ms. Donna Huff, Air Quality Division Director, MC 206
Implementation Grants Section via email to VWsettle@tceq.texas.gov