



**Mission Statement**

*“Provide safe, clean, reliable, accessible and friendly public transportation services to our region.”*

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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:

The Metropolitan Transit Authority of Harris County, Texas (METRO) appreciates the Texas Commission on Environmental Quality (TCEQ) providing the opportunity to provide comments on the Volkswagen Environmental Mitigation Plan.

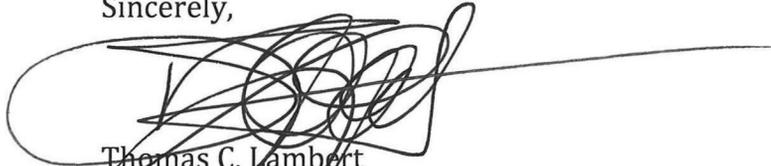
Upon review, the draft plan should be updated to reflect the following items:

- METRO requests that TCEQ reallocate the funding based on the percentage of affected vehicles found within the priority areas. Approximately 24% of the affected vehicles were registered in the Houston region although TCEQ has allocated only 13.91% of the funds to the region. Fairness suggest that funds be allocated most heavily to the areas most significantly impacted by the affected vehicles.
- METRO requests increasing the proposed maximum funding percentage from 60% to 80% or better for all categories within the plan. Hurricane Harvey has impacted numerous agencies across the Houston region making already fiscally constrained budgets even tighter. By increasing the percentage to all categories TCEQ will provide a fair and impactful funding threshold.
- METRO requests that the funds be awarded on a discretionary basis and not on a first-come, first-served basis. This will allow TCEQ to fully review and determine which projects provide the best environmental and economic benefits.

By including these recommendations into the plan, TCEQ will enhance each region’s ability to mitigate the damage caused by Volkswagen’s fraudulent activities.

Thank you, once again, for the opportunity to provide comments on this initiative.  
Please feel free to contact Albert Lyne, Director Grant Programs at 713-739-4637, if you  
have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Lambert', with a long horizontal line extending to the right.

Thomas C. Lambert  
President & CEO

CC: Arthur C. Smiley III, METRO  
Albert Lyne, METRO  
Alan Clark, H-GAC