

Bryan W. Shaw, Ph.D., *Chairman*
Buddy Garcia, *Commissioner*
Carlos Rubinstein, *Commissioner*
Mark R. Vickery, P.G., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

August 31, 2011

Guy Donaldson
Chief, Air Planning Section
U.S. Environmental Protection Agency, Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Dear Mr. Donaldson:

This letter is being sent to provide clarification on comments included in a June 28, 2011, letter from Dr. Armendariz to Governor Perry regarding nitrogen dioxide (NO₂) designation recommendations. Governor Perry submitted NO₂ designation recommendations to the United States Environmental Protection Agency (EPA) on January 22, 2011 (Attachment 1). These recommendations included a designation of attainment for 17 counties in Texas with regulatory monitors and a designation recommendation of unclassifiable for all other areas in the state. In the June 28, 2011, letter from Dr. Armendariz to Governor Perry (Attachment 2), the EPA indicates that you intend to designate Texas as unclassifiable/attainment. This same letter also cautions that "your state carefully consider the implications for the Prevention of Significant Deterioration (PSD) permitting program of having the entire state designated as a single area rather than smaller areas."

We understand that you are interpreting our designation recommendation as requesting a "rest of state" designation, which you would interpret in accordance with 40 Code of Federal Regulations (CFR) § 81.300. The purpose of this letter is to clarify that we are not suggesting or indicating that the entire State of Texas be a single air quality planning area or region for NO₂. In fact, the state recommendation was specific to the county level in designating areas that measured attainment of the National Ambient Air Quality Standard (Attachment 3). The recommendation letter stated that other areas of the state should be considered unclassifiable. Please consider this letter as our request to clarify our designation recommendation to be specific to each county level individually, as attached. Additionally, if the Texas Commission on Environmental Quality were in the future to identify an area not measuring attainment of the standard, any recommended nonattainment boundary would be appropriate for that specific designation and purpose and may be larger or smaller than an individual county.

If you would like to discuss this issue further or desire additional information or clarification, please contact me at (512) 239-1725 or Donna Huff, Air Quality Planning Section Manager, at (512) 239-6628.

Sincerely,

A handwritten signature in black ink that reads "David Brymer".

David Brymer, Director
Air Quality Division

Enclosures



STATE OF TEXAS
OFFICE OF THE GOVERNOR

RICK PERRY
GOVERNOR

January 22, 2011

Mr. Lawrence E. Starfield
Administrator
Deputy Regional Administrator
U.S. Environmental Protection Agency, Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Dear Administrator Starfield:

I am pleased to inform you that Texas continues to make progress with our air quality. Since 2000, Texans have seen a 53 percent reduction in industrial sources of nitrogen oxide emissions and a 27 percent reduction in ozone, both outpacing the national average. The Houston area recently met the eight-hour National Ambient Air Quality Standard (NAAQS) for ozone for the first time, while the Dallas/Fort Worth area is within one part per billion of meeting the standard.

Pursuant to the requirements in Section 107(d)(3) of the Federal Clean Air Act, enclosed is the recommendation for designation of areas in Texas with regard to the 2010 one-hour primary nitrogen dioxide (NO₂) NAAQS of 100 parts per billion.

The Texas Commission on Environmental Quality (TCEQ) recommends that all counties in Texas with applicable NO₂ monitoring data (see Attachment A) be designated attainment and all other areas be designated as unclassifiable/attainment, based on the three most recent years of quality-assured air data from the current monitoring network for the years 2007-2009.

Enclosed is a resolution, with 2009 supporting data, containing the 2010 NO₂ NAAQS designation recommendation.

If you have any questions or need additional information, please feel free to contact TCEQ Chairman Bryan Shaw at (512) 239-5510.

Sincerely,

A handwritten signature in black ink that reads "Rick Perry".

Rick Perry
Governor

RP:tbgg

Enclosures

cc: ~~Bryan W. Shaw, Ph.D., Chairman, TCEQ~~

Attachment A

Design Values by County for NO₂

| County | EPA 2006-2008 Design Values (average 98th percentile) ppb | EPA 2007-2009 Design Values (average 98th percentile) ppb |
|------------|--|--|
| El Paso | 67 | 65 |
| Harris | 62 | 54 |
| Tarrant | 60 | 54 |
| Dallas | 58 | 55 |
| Bexar | 54 | 52 |
| Ellis | 45 | 44 |
| Jefferson | 42 | 41 |
| Brazoria | 38 | 37 |
| Denton | 37 | 35 |
| Montgomery | 36 | 35 |
| Orange | 36 | 34 |
| Hunt | 32 | 30 |
| Kaufman | 31 | 30 |
| Gregg | 30 | 31 |
| Travis | 26 | 24 |
| Smith | 23 | 21 |
| Harrison | 21 | 19 |

Source: EPA's Air Quality System database (<http://www.epa.gov/ttn/airs/airsaqs>)

Bryan W. Shaw, Ph.D., *Chairman*
Buddy Garcia, *Commissioner*
Carlos Rubinstein, *Commissioner*
Mark R. Vickery, P.G., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

December 1, 2010

The Honorable Rick Perry
Governor of Texas
State Capitol
P. O. Box 12428
Austin, TX 78711-2428

Dear Governor Perry:

The United States Environmental Protection Agency (EPA) revised the National Ambient Air Quality Standard (NAAQS) for nitrogen dioxide (NO₂) to 100 parts per billion for the one-hour standard on January 22, 2010. Section 107(d)(3) of the Federal Clean Air Act (FCAA) requires the governor of each state to submit to the EPA a list of all areas with a designation recommendation of attainment, nonattainment, or unclassifiable.

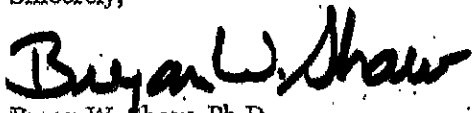
The Texas Commission on Environmental Quality (TCEQ) recommends that all counties in Texas with applicable NO₂ monitoring data be designated attainment and all other areas be designated as unclassifiable/attainment, based on the three most recent years of quality-assured air data from the current monitoring network for the years 2007 through 2009.

Because the EPA is also requiring a new monitoring network as part of the revised NO₂ NAAQS, it is possible that the EPA will exercise its authority under the FCAA, §107(d)(3) to redesignate areas from unclassifiable/attainment to attainment or nonattainment after the state has collected three years of near-road monitoring data, beginning in January 2013.

Enclosed are a resolution, cover letter, and attachment containing the designation recommendation for your signature to be submitted to the EPA by the January 22, 2011, deadline.

If I can be of any assistance, please contact me at 512-239-5510.

Sincerely,


Bryan W. Shaw, Ph.D.
Chairman

Enclosures

cc: Toby Baker, Office of Budget, Planning and Policy, Office of the Governor
Mark R. Vickery, P.G., Executive Director, TCEQ

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



COUNTY OF TRAVIS

I hereby certify that this is a true and correct copy of a Texas Commission on Environmental Quality document, which is filed in the permanent records of the Commission. Given under my hand and the seal of office on

LaDonna Castanuela NOV 22 2010

LaDonna Castanuela, Chief Clerk
Texas Commission on Environmental Quality

**Resolution Concerning Nitrogen Dioxide
National Ambient Air Quality Standard Designations**

2010-1496-RES

WHEREAS, the Texas Commission on Environmental Quality (Commission) met on November 18, 2010, to discuss and consider designation recommendations for the 2010 one-hour primary nitrogen dioxide (NO₂) National Ambient Air Quality Standard (NAAQS) for submittal to the Governor for his consideration and transmittal to the United States Environmental Protection Agency (EPA); and

WHEREAS, the Commission finds that the EPA revised the NO₂ NAAQS effective April 12, 2010, establishing a new one-hour primary NO₂ NAAQS at 100 parts per billion (ppb); and

WHEREAS, the Commission acknowledges that the Federal Clean Air Act (FCAA), § 107(d), requires the EPA, after the promulgation of a new or revised NAAQS, to designate areas as attainment, nonattainment, or unclassifiable; and

WHEREAS, the Commission acknowledges that the FCAA, § 107(d), also establishes a process for each Governor to provide recommendations to the EPA regarding appropriate designations for the new one-hour primary NO₂ NAAQS for their state, including appropriate geographic boundaries; and

WHEREAS, the Commission acknowledges that the EPA has specified a deadline for the submittal of recommended designations for the new one-hour primary NO₂ NAAQS of January 22, 2011; and


WHEREAS, the Commission acknowledges that the EPA recommends States identify areas not in compliance with the new or revised NAAQS using the most recent three years of air quality data, preferably data from calendar years 2007 through 2009, stored in the EPA Air Quality System (AQS,) from Federal Reference Method and Federal Equivalent Method monitors that are sited and operated in accordance with 40 Code of Federal Regulations (CFR) Part 58; and

WHEREAS, the Commission finds that based on AQS monitoring data from 2007 through 2009, all monitors in Texas with data eligible for comparison to the new one-hour primary NO₂ NAAQS meet the revised NAAQS (Attachment A); and

RESOLVED, that the Commission hereby requests the Governor of Texas to submit a designation recommendation of attainment for all areas of the state with EPA's Air Quality System monitors demonstrating that the 2010 one-hour primary NO₂ NAAQS and that the rest of the State be designated as unclassifiable/attainment for the 2010 one-hour primary NO₂ NAAQS to the EPA for consideration, along with data analysis supporting this recommendation, by the EPA's requested deadline of January 22, 2011.

Issued date: **NOV 22 2010**

TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY


Bryan W. Shaw, Ph.D., Chairman



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS TX 75202-2733

JUN 28 2011

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JUL 01 2011

Texas Commission on Environmental Quality
Commissioners' Offices

The Honorable Rick Perry
Governor of Texas
Post Office Box 12428
Austin, Texas 78711

Dear Governor Perry:

Thank you for your recommendations on air quality designations for the revised primary National Ambient Air Quality Standard (NAAQS) for nitrogen dioxide (NO₂) throughout Texas. This letter is to notify you of the U.S. Environmental Protection Agency's (EPA) response to Texas' designation recommendations, and to inform you of our approach for completing the designations for the revised NO₂ NAAQS.

On January 22, 2010, the EPA strengthened the health-based NAAQS for NO₂ by setting a new 1-hour NO₂ standard at the level of 100 parts per billion (ppb). This new standard will protect against adverse health effects associated with short-term exposure to NO₂, including respiratory effects that can result in admission to a hospital. The EPA also retained, with no change, the annual average NO₂ standard of 53 ppb. This set of standards will protect public health by limiting exposures to short-term peak concentrations of NO₂ and by limiting community-wide NO₂ concentrations to levels below those that have been linked to respiratory-related emergency department visits and hospital admissions in the United States. To determine compliance with the new standard, the EPA established new ambient air monitoring and reporting requirements for NO₂. In urban areas, monitors are required near major roads as well as in other locations where maximum concentrations are expected. Additional monitors will be required in some large urban areas to measure the highest concentrations of NO₂ that occur more broadly across communities.

In the preamble to the 2010 NO₂ NAAQS and in the EPA's October 2010 letter to you requesting designation recommendations, the EPA stated that it expected to designate most areas of the country as "unclassifiable," indicating that there are insufficient data to determine whether or not an area is attaining the revised NO₂ NAAQS. This approach took into account that the new monitoring network requirements established with the revised NO₂ NAAQS will not be effective until January 2013 and that air quality data from these new monitors would not be available for these initial designations.

The EPA has reviewed your recommendations and others, and intends to designate all areas of Texas, as well as the rest of the country, as "unclassifiable/attainment" rather than "unclassifiable." Based on air quality data from 2008-2010, all monitored areas in the country meet the 2010 NO₂ NAAQS. While the EPA acknowledges that the existing NO₂ monitoring network does not provide adequate evidence to

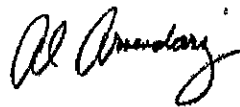
determine whether or not the new NAAQS is met in all areas, there is currently no evidence of violations anywhere in the country. The "unclassifiable/attainment" designation better reflects the current air quality conditions. The EPA intends to redesignate areas, as appropriate, after sufficient air quality details from the new monitoring network are available.

The EPA intends to designate Texas unclassifiable/attainment using the boundaries Texas recommended to the EPA or revised boundaries you may provide in response to this letter. In past designations for NO₂, for the majority of states, the area of the state where the air quality could not be classified, or was better than the national standards, was given a statewide, or rest-of-state designation. However, the EPA recommends that your state carefully consider the implications for the Prevention of Significant Deterioration permitting program of having the entire state designated as a single area rather than smaller areas (e.g., counties, groups of counties, etc.). To ensure that the size of designated areas is consistent with your state's objectives for managing air quality deterioration and economic growth, we recommend that your permitting staff be consulted on the area boundary issues.

If your state has additional information that you want the EPA to consider with respect to the EPA's designation, please submit it to us by August 29, 2011. We are also making the EPA's preliminary designation decisions and supporting documentation available to the general public for review. We are accepting public comments on our preliminary decisions for 30 days after a notice announcing the public comment period is published in the *Federal Register*. We will review any information we receive from the State of Texas and the general public by this date, and we plan to promulgate the final designations by October 31, 2011.

We look forward to a continued dialogue with you and your staff as we work together to implement the 2010 NO₂ NAAQS. If you have any questions, please contact me at (214) 665-2100, or your staff may contact Mr. Guy Donaldson of my staff at (214) 665-7242.

Sincerely,



Al Armendariz
Regional Administrator

cc: Bryan W. Shaw, Ph.D.
Chairman, Texas Commission on Environmental Quality

Mark Vickery, P.G.
Executive Director, Texas Commission on Environmental Quality

Designation Recommendations by Texas County for Nitrogen Dioxide (NO₂)

| County | Recommendation |
|---------------|---------------------------|
| Anderson | Unclassifiable/Attainment |
| Andrews | Unclassifiable/Attainment |
| Angelina | Unclassifiable/Attainment |
| Aransas | Unclassifiable/Attainment |
| Archer | Unclassifiable/Attainment |
| Armstrong | Unclassifiable/Attainment |
| Atascosa | Unclassifiable/Attainment |
| Austin | Unclassifiable/Attainment |
| Bailey | Unclassifiable/Attainment |
| Bandera | Unclassifiable/Attainment |
| Bastrop | Unclassifiable/Attainment |
| Baylor | Unclassifiable/Attainment |
| Bee | Unclassifiable/Attainment |
| Bell | Unclassifiable/Attainment |
| Bexar | Attainment |
| Blanco | Unclassifiable/Attainment |
| Borden | Unclassifiable/Attainment |
| Bosque | Unclassifiable/Attainment |
| Bowie | Unclassifiable/Attainment |
| Brazoria | Attainment |
| Brazos | Unclassifiable/Attainment |
| Brewster | Unclassifiable/Attainment |
| Briscoe | Unclassifiable/Attainment |
| Brooks | Unclassifiable/Attainment |
| Brown | Unclassifiable/Attainment |
| Burleson | Unclassifiable/Attainment |
| Burnet | Unclassifiable/Attainment |
| Caldwell | Unclassifiable/Attainment |
| Calhoun | Unclassifiable/Attainment |
| Callahan | Unclassifiable/Attainment |
| Cameron | Unclassifiable/Attainment |
| Camp | Unclassifiable/Attainment |
| Carson | Unclassifiable/Attainment |
| Cass | Unclassifiable/Attainment |
| Castro | Unclassifiable/Attainment |
| Chambers | Unclassifiable/Attainment |
| Cherokee | Unclassifiable/Attainment |
| Childress | Unclassifiable/Attainment |

Attachment 3

| County | Recommendation |
|---------------|---------------------------|
| Clay | Unclassifiable/Attainment |
| Cochran | Unclassifiable/Attainment |
| Coke | Unclassifiable/Attainment |
| Coleman | Unclassifiable/Attainment |
| Collin | Unclassifiable/Attainment |
| Collingsworth | Unclassifiable/Attainment |
| Colorado | Unclassifiable/Attainment |
| Comal | Unclassifiable/Attainment |
| Comanche | Unclassifiable/Attainment |
| Concho | Unclassifiable/Attainment |
| Cooke | Unclassifiable/Attainment |
| Coryell | Unclassifiable/Attainment |
| Cottle | Unclassifiable/Attainment |
| Crane | Unclassifiable/Attainment |
| Crockett | Unclassifiable/Attainment |
| Crosby | Unclassifiable/Attainment |
| Culberson | Unclassifiable/Attainment |
| Dallam | Unclassifiable/Attainment |
| Dallas | Attainment |
| Dawson | Unclassifiable/Attainment |
| Deaf Smith | Unclassifiable/Attainment |
| Delta | Unclassifiable/Attainment |
| Denton | Attainment |
| DeWitt | Unclassifiable/Attainment |
| Dickens | Unclassifiable/Attainment |
| Dimmit | Unclassifiable/Attainment |
| Donley | Unclassifiable/Attainment |
| Duval | Unclassifiable/Attainment |
| Eastland | Unclassifiable/Attainment |
| Ector | Unclassifiable/Attainment |
| Edwards | Unclassifiable/Attainment |
| El Paso | Attainment |
| Ellis | Attainment |
| Erath | Unclassifiable/Attainment |
| Falls | Unclassifiable/Attainment |
| Fannin | Unclassifiable/Attainment |
| Fayette | Unclassifiable/Attainment |
| Fisher | Unclassifiable/Attainment |
| Floyd | Unclassifiable/Attainment |
| Foard | Unclassifiable/Attainment |

Attachment 3

| County | Recommendation |
|---------------|---------------------------|
| Fort Bend | Unclassifiable/Attainment |
| Franklin | Unclassifiable/Attainment |
| Freestone | Unclassifiable/Attainment |
| Frio | Unclassifiable/Attainment |
| Gaines | Unclassifiable/Attainment |
| Galveston | Unclassifiable/Attainment |
| Garza | Unclassifiable/Attainment |
| Gillespie | Unclassifiable/Attainment |
| Glasscock | Unclassifiable/Attainment |
| Goliad | Unclassifiable/Attainment |
| Gonzales | Unclassifiable/Attainment |
| Gray | Unclassifiable/Attainment |
| Grayson | Unclassifiable/Attainment |
| Gregg | Attainment |
| Grimes | Unclassifiable/Attainment |
| Guadalupe | Unclassifiable/Attainment |
| Hale | Unclassifiable/Attainment |
| Hall | Unclassifiable/Attainment |
| Hamilton | Unclassifiable/Attainment |
| Hansford | Unclassifiable/Attainment |
| Hardeman | Unclassifiable/Attainment |
| Hardin | Unclassifiable/Attainment |
| Harris | Attainment |
| Harrison | Attainment |
| Hartley | Unclassifiable/Attainment |
| Haskell | Unclassifiable/Attainment |
| Hays | Unclassifiable/Attainment |
| Hemphill | Unclassifiable/Attainment |
| Henderson | Unclassifiable/Attainment |
| Hidalgo | Unclassifiable/Attainment |
| Hill | Unclassifiable/Attainment |
| Hockley | Unclassifiable/Attainment |
| Hood | Unclassifiable/Attainment |
| Hopkins | Unclassifiable/Attainment |
| Houston | Unclassifiable/Attainment |
| Howard | Unclassifiable/Attainment |
| Hudspeth | Unclassifiable/Attainment |
| Hunt | Attainment |
| Hutchinson | Unclassifiable/Attainment |
| Irion | Unclassifiable/Attainment |

Attachment 3

| County | Recommendation |
|---------------|---------------------------|
| Jack | Unclassifiable/Attainment |
| Jackson | Unclassifiable/Attainment |
| Jasper | Unclassifiable/Attainment |
| Jeff Davis | Unclassifiable/Attainment |
| Jefferson | Attainment |
| Jim Hogg | Unclassifiable/Attainment |
| Jim Wells | Unclassifiable/Attainment |
| Johnson | Unclassifiable/Attainment |
| Jones | Unclassifiable/Attainment |
| Karnes | Unclassifiable/Attainment |
| Kaufman | Attainment |
| Kendall | Unclassifiable/Attainment |
| Kenedy | Unclassifiable/Attainment |
| Kent | Unclassifiable/Attainment |
| Kerr | Unclassifiable/Attainment |
| Kimble | Unclassifiable/Attainment |
| King | Unclassifiable/Attainment |
| Kinney | Unclassifiable/Attainment |
| Kleberg | Unclassifiable/Attainment |
| Knox | Unclassifiable/Attainment |
| La Salle | Unclassifiable/Attainment |
| Lamar | Unclassifiable/Attainment |
| Lamb | Unclassifiable/Attainment |
| Lampasas | Unclassifiable/Attainment |
| Lavaca | Unclassifiable/Attainment |
| Lee | Unclassifiable/Attainment |
| Leon | Unclassifiable/Attainment |
| Liberty | Unclassifiable/Attainment |
| Limestone | Unclassifiable/Attainment |
| Lipscomb | Unclassifiable/Attainment |
| Live Oak | Unclassifiable/Attainment |
| Llano | Unclassifiable/Attainment |
| Loving | Unclassifiable/Attainment |
| Lubbock | Unclassifiable/Attainment |
| Lynn | Unclassifiable/Attainment |
| Madison | Unclassifiable/Attainment |
| Marion | Unclassifiable/Attainment |
| Martin | Unclassifiable/Attainment |
| Mason | Unclassifiable/Attainment |
| Matagorda | Unclassifiable/Attainment |

Attachment 3

| County | Recommendation |
|---------------|---------------------------|
| Maverick | Unclassifiable/Attainment |
| McCulloch | Unclassifiable/Attainment |
| McLennan | Unclassifiable/Attainment |
| McMullen | Unclassifiable/Attainment |
| Medina | Unclassifiable/Attainment |
| Menard | Unclassifiable/Attainment |
| Midland | Unclassifiable/Attainment |
| Milam | Unclassifiable/Attainment |
| Mills | Unclassifiable/Attainment |
| Mitchell | Unclassifiable/Attainment |
| Montague | Unclassifiable/Attainment |
| Montgomery | Attainment |
| Moore | Unclassifiable/Attainment |
| Morris | Unclassifiable/Attainment |
| Motley | Unclassifiable/Attainment |
| Nacogdoches | Unclassifiable/Attainment |
| Navarro | Unclassifiable/Attainment |
| Newton | Unclassifiable/Attainment |
| Nolan | Unclassifiable/Attainment |
| Nueces | Unclassifiable/Attainment |
| Ochiltree | Unclassifiable/Attainment |
| Oldham | Unclassifiable/Attainment |
| Orange | Attainment |
| Palo Pinto | Unclassifiable/Attainment |
| Panola | Unclassifiable/Attainment |
| Parker | Unclassifiable/Attainment |
| Parmer | Unclassifiable/Attainment |
| Pecos | Unclassifiable/Attainment |
| Polk | Unclassifiable/Attainment |
| Potter | Unclassifiable/Attainment |
| Presidio | Unclassifiable/Attainment |
| Rains | Unclassifiable/Attainment |
| Randall | Unclassifiable/Attainment |
| Reagan | Unclassifiable/Attainment |
| Real | Unclassifiable/Attainment |
| Red River | Unclassifiable/Attainment |
| Reeves | Unclassifiable/Attainment |
| Refugio | Unclassifiable/Attainment |
| Roberts | Unclassifiable/Attainment |
| Robertson | Unclassifiable/Attainment |

Attachment 3

| County | Recommendation |
|---------------|---------------------------|
| Rockwall | Unclassifiable/Attainment |
| Runnels | Unclassifiable/Attainment |
| Rusk | Unclassifiable/Attainment |
| Sabine | Unclassifiable/Attainment |
| San Augustine | Unclassifiable/Attainment |
| San Jacinto | Unclassifiable/Attainment |
| San Patricio | Unclassifiable/Attainment |
| San Saba | Unclassifiable/Attainment |
| Schleicher | Unclassifiable/Attainment |
| Scurry | Unclassifiable/Attainment |
| Shackelford | Unclassifiable/Attainment |
| Shelby | Unclassifiable/Attainment |
| Sherman | Unclassifiable/Attainment |
| Smith | Attainment |
| Somervell | Unclassifiable/Attainment |
| Starr | Unclassifiable/Attainment |
| Stephens | Unclassifiable/Attainment |
| Sterling | Unclassifiable/Attainment |
| Stonewall | Unclassifiable/Attainment |
| Sutton | Unclassifiable/Attainment |
| Swisher | Unclassifiable/Attainment |
| Tarrant | Attainment |
| Taylor | Unclassifiable/Attainment |
| Terrell | Unclassifiable/Attainment |
| Terry | Unclassifiable/Attainment |
| Throckmorton | Unclassifiable/Attainment |
| Titus | Unclassifiable/Attainment |
| Tom Green | Unclassifiable/Attainment |
| Travis | Attainment |
| Trinity | Unclassifiable/Attainment |
| Tyler | Unclassifiable/Attainment |
| Upshur | Unclassifiable/Attainment |
| Upton | Unclassifiable/Attainment |
| Uvalde | Unclassifiable/Attainment |
| Val Verde | Unclassifiable/Attainment |
| Van Zandt | Unclassifiable/Attainment |
| Victoria | Unclassifiable/Attainment |
| Walker | Unclassifiable/Attainment |
| Waller | Unclassifiable/Attainment |
| Ward | Unclassifiable/Attainment |

Attachment 3

| County | Recommendation |
|---------------|---------------------------|
| Washington | Unclassifiable/Attainment |
| Webb | Unclassifiable/Attainment |
| Wharton | Unclassifiable/Attainment |
| Wheeler | Unclassifiable/Attainment |
| Wichita | Unclassifiable/Attainment |
| Wilbarger | Unclassifiable/Attainment |
| Willacy | Unclassifiable/Attainment |
| Williamson | Unclassifiable/Attainment |
| Wilson | Unclassifiable/Attainment |
| Winkler | Unclassifiable/Attainment |
| Wise | Unclassifiable/Attainment |
| Wood | Unclassifiable/Attainment |
| Yoakum | Unclassifiable/Attainment |
| Young | Unclassifiable/Attainment |
| Zapata | Unclassifiable/Attainment |
| Zavala | Unclassifiable/Attainment |