

May 9, 2007

Via email

Mr. Bart Croes
Division Chief
California Air Resources Board
1001 I Street
Sacramento CA 95812

Re: Additional SCAQMD Comment - Proposed Early Actions to Mitigate Climate Change in California

Dear Mr. Croes:

South Coast Air Quality Management (SCAQMD) staff sent comments on May 7, 2007 regarding the Proposed Early Actions to Mitigate Climate Change in California. We have an additional comment that CARB staff should consider for inclusion.

An early action measure should be added to require that natural gas supplies for the state be at a Wobbe index of 1360 or lower. As you know, higher carbon content will result in increased carbon dioxide emissions. It is possible to achieve this level by securing natural gas sources with low Btu content, removing heavier hydrocarbon components by a condensing process, injection of inert gas such nitrogen, and blending high Btu gas with low Btu gas. This would have concurrent nitrogen oxides benefits, as well. Please see control measure #2007CMB-04 in the draft 2007 Air Quality Management Plan for additional information.

Thank you for considering this addition to the early action list. If you have any questions or would like to discuss this further, please call me at (909) 396-3104 or Elaine Chang at (909) 396-3186.

Sincerely,

Jill Whynot
Planning and Rules Manager

EC:JW

cc: Alberto Ayala, CARB
M. Robert, CARB