March 24, 2016

To: California Air Resources Board

From: Norvell Nelson, Ph.D., Longbow Technology Ventures

Re: Commentary on the Draft Aliso Canyon Climate Impacts Mitigation Program

It is our opinion that the second section on “Areas of Concentration” under the definition of Mitigation Projects unnecessarily limits the scope of the subsidizing of purchases of low-emission or near zero-emission vehicles to vehicles which are overly costly and unfairly limited in supply which would have minimal effect in lowering the NOx emissions which maintain the ozone non-attainment status of the effected districts.

While, mitigation through recapture of fugitive methane emissions can be considered a direct compensation for the Aliso Canyon leak, other approaches to the lowering of GHG and NOx emissions could and would have a more direct near term positive effect on the ambient air conditions in the affected districts.

The inclusion of a retrofit technology, replacing ½ of the diesel fuel consumed with CNG or preferably, RNG, for the many older diesel trucks operating in the SCAQMD and SJVAPCD areas would allow for reduction of both GHG emissions and compliance with the 2010 emission standards for on-road diesel engines. This technology will be available in the near term for pre-2010 Heavy Duty Diesel Engines (and is currently available for the most popular 2010 and newer Heavy Duty Diesel Engines) and will afford a cost effective method for reduction of the NOx and PM emissions, which are a major contribution to the severe non-attainment problems in these districts.

The apparent proposed limitation of transportation mitigation efforts to low-emission or zero-emission vehicles eliminates consideration of vehicular technologies which could have near term benefits for reduction of critical criteria pollutants and real GHG reductions while maintaining the transportation resources required to run the economies of affected districts, Greater California and the Western US, which, so much of said transportation originates in the affected districts.

Sincerely,

Norvell Nelson, Ph.D.

CTO Longbow Technology Ventures

Former Member Citizens Advisory Council SBAPCD