

Church, Steve@ARB

From: Steve Brink [steveb@foresthealth.org]

Sent: Friday, October 23, 2009 9:54 AM

To: Church, Steve@ARB

Subject: message from Steve Brink re: One Comment on the Final ETAAC Report Sec. 6.2

In Sec. 6.2 – ETAAC talks about the need to reduce diesel engine emissions to curb the production of Particulate Matter (2.5 micron and less) and the solid fraction, black carbon. ETAAC does not display the all the sources of PM 2.5 in California. If they had, they would quickly realize that wildfire emissions (30% of PM emissions) and residential wood fireplaces (14% of PM emissions) far exceed diesel engine exhaust (5.8% of PM emissions).

The Forest Service's own researchers say that if the forests were thinned and surface and ladder fuels removed and the fuels objective maintained, wildfires could be reduced by at least 50-60%. There is sufficient value in the commercial-size thinned trees to cover the total cost of biomass removal. Hence we could reduce PM emissions by 15% or so if we just had an aggressive approach to managing our Forests. Instead, ETAAC (and CARB) are focused diesel engine emission rules that will require in-state fleet owners to completely turnover their fleets in the next 13 years at a cost of billions of dollars (which will simply put most of them out of business).

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