There are no comments posted to Open Comment for the January 23, 2025, Board Meeting (january2025opencomm) at this time.

Comment 1 for Open Comment for the January 23, 2025, Board Meeting (january2025opencomm). (At Hearing)

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Subject: Fires - Chrome - Aircraft Maintenance (Still no practical response)
Comment:

Wildfires are the largest threat to California's air resources. CalFire is the agency responsible for responding to wildfires. Aviation equipment is CalFire's most responsive and effective tool for combatting wildfire. Aviation equipment is manufactured and kept in good repair using hard chrome plating processes. CalFire's aviation fleet cannot fly without properly maintained propeller systems, main and tail rotor controls and servos, landing systems, and thrust reversers to name only a few flight critical systems reliant on hard chrome plating. These systems are pervasive across the entire CalFire fixed wing and helicopter fleets and across the fleets of contract aviation companies used by CalFire in response to major incidents. These systems require frequent inspections, sometimes during incidents, and those inspections can dictate removal and replacement of the component before the aircraft can fly again. Removed components can be (and are) repaired with hard chrome plating processes and returned to "rotable pools" to assure rapid replacement of flight critical components during fire season and major fire incidents. Rapid and effective repairs are a contributing factor to CalFire readiness.

There is not a technological alternative to the use of hard chrome plating in the manufacture and repair of these fire-fighting aircraft. The aircraft are certified as safe by the Federal Aviation Administration because of engineering designs and repair and maintenance schemes which utilize hard chrome applications. So, not only is hard chrome the only technology available to support these firefighting assets, hard chrome is the only legal method to support these assets.

The California Air Resources Board has banned chrome plating in California. The ban for hard chrome is effective January 1, 2039. The ban was instituted by CARB with knowledge that no technological substitute has been invented/discovered. CARB is also aware that if a technological substitute is found, the substitute method must be found acceptable to aircraft design engineers and the FAA prior to the use of that method in future designs and repair schemes. Even the newest aircraft designs of airplanes coming off assembly lines today use chrome plating. This means that chrome plating will be a necessary part of infrastructure for at least 30 years and since fire-fighters like to use aged aircraft designs as platforms (C-130, UH-1 are over 60 years old), it is easy to see that CalFire will rely on chrome plating well past 2039.

California chrome plating firms who support CalFire face elimination. They are on death row. Each dollar invested in facility or equipment is wasted. CalFire may have expanding needs for fire suppression, but chrome platers are not incentivized to invest in capacity. They are incentivized to close - an expensive

proposition. Closing and moving is even more expensive. They will close and they won't wait until 2039 to do so.
The work of supporting CalFire will fall to chrome platers in other states and countries - Locations with less robust regulatory controls than California. Locations with no rule 1469, the toughest chrome rule in the world. So, if CARB is correct about deadly emissions, CARB will have shifted those emissions to locations where they will be even more deadly. CARB says it believes in the equality of all people but this is a concrete example of explicit CARB policy to move emissions to areas where people are disadvantaged by less stringent regulatory regimes in addition to all the other disadvantages they may encounter in life. In October, a CARB Board member posted on "X" her thanks to aviation firefighters for saving her community. Her future posts will need to also extend thanks to the people of Mexico, Arizona, and Nevada for their sacrifice in using a process that she banned to protect her.
It is reasonable to conclude that other states and countries will not put up with California's behavior forever. Policy makers in those states, countries, and at the US federal level are likely to understand the bigger-picture practical necessity to maintain aircraft to put out fires. California and CARB should expect to encounter funding and policy difficulties as this situation persists.
By the way, chrome plating is not just used on fire-fighting aircraft. Chrome plating is also used on all transport aircraft, freight aircraft, military aircraft, and coast guard aircraft. CARB is destroying the infrastructure of America and to some extent the world. It is time to correct CARB's mistake. It is time to recognize that HEPA controlled chrome platers who comply with AQMD Rule 1469 (the toughest chrome plating rule in the world) who don't use PFAS/PFOS (and never did), and who are not located near sensitive receptors are an acceptable and reasonable risk considering the damage done by fires in California.
This is yet another attempt to create constructive dialog with a motivated CARB. One introductory phone call is an extremely poor look for you. Responsible board members should feel embarrassed. Public comment is not dialog. It is proof of the lack of dialog.

Attachment:

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No Duplicates.