

There are no comments posted to Informational Update on CARB's Los Angeles Fire Incident Response Activities (lafirerespectivities) at this time.

Comment 1 for Informational Update on CARB's Los Angeles Fire Incident Response Activities (lafirerespectivities). (At Hearing)

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Subject: Fire Response (LA Fire and Future Fires)

Comment:

On the topic of fire response...It is good to learn lessons from sniffing the air after fires. As in previous instances, it will reinforce the lesson that it is good to extinguish fires quickly.

There is no technological alternative to the use of hard chrome plating in the manufacture and repair of fire-fighting aircraft. Additionally, it is illegal to use alternative repair methods which are not approved by the FAA. Trivalent chrome plating is not technologically feasible or legal for aircraft manufacture and repair. Every aircraft used to combat the fires required hard hexavalent chrome plating. The CalFire supply and repair chain is dependent on hard chrome plating capacity. We are part of that maintenance and repair chain.

This board has banned hard chrome plating. As a result, firms supporting CalFire (and airlines, and DOD) are disinvesting. Hawker Pacific has closed. This means the capacity to manufacture and repair key aircraft parts is shrinking. Examples of impacted systems are: propeller systems, turbine engines, main and tail rotor controls, landing gear, thrust reversers, and other flight critical components.

Yet, at the same time capacity is shrinking, this board predicts an increase in wildfire activity due to climate change.

How does this board reconcile the divergence between the need to increase firefighting capacity and its own regulations which ban capacity? I have raised this issue for two years and leadership continues to turn a deaf ear. As time passes and future crises arise other voices will join mine. We will all wonder why the board did not move to correct its error earlier. Lives were lost in these fires. It is likely lives will be lost in future fires. We should all want to support rapid extinguishment of fires. Leadership on this is desperately needed.

Somehow, this board (with staff input) invested itself in the notion that Trivalent Chrome Plating is a viable alternative for the aircraft industry. It is not. At one point, a board member asked staff what industry thought of the proposed chrome plating ban. Staff answered that they had "talked to Boeing" and apparently, that answer satisfied the board. Well, I am here to tell you that Boeing in nearly all cases, is not the manufacturer or the maintenance and repair provider for the helicopters and turbo-prop aircraft in the CalFire fleet. I speak as a 20+ year veteran former employee of Boeing.

I am grateful for the opportunity to again insert this concern in the public record. I pray the mechanisms CARB has instilled to collect this input will result in action by responsible individuals concerned with public safety. To date, I have received no communication from CARB staff which indicates any motivation to explore safe alternatives to the ban.

Attachment:

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No Duplicates.