

**There are no comments posted to Open Comment for the May 23, 2024 Board Meeting (may2024opencomm) at this time.**

## **Comment 1 for Open Comment for the May 23, 2024 Board Meeting (may2024opencomm). (At Hearing)**

First Name: Zan

Last Name: Dubin

Email Address: zan@zdscommunications.com

Affiliation: ZDS Communications

Subject: Disneyland's Autopia Ride

Comment:

To CARB members:

You may have heard that Disneyland will convert the gas cars at its Autopia ride to electric. I led the campaign that brought this about with coverage from the LA Times. We applaud Disneyland. But the park has said it will electrify the cars by fall 2026--another 30 months.

Complaints about Autopia's putrid emissions--going back years--are rife. When we filed a complaint with AQMD, an inspector told us that a Disneyland environmental engineer told her he had received similar complaints. An Autopia employee told me he gets headaches. I read it is "very common" for Autopia managers to get employee-transfer requests accompanied by doctors' notes and that employees get hazard pay because of the fumes.

Headaches are one of the most common symptoms of poisoning from carbon monoxide, vehicles being the greatest outdoor source of this gas. Proximity and timing are key, of course, and Autopia employees stand right next to the cars for extended periods during their eight-hour shifts. Is CO causing the headaches and doctor notes? Or is it something else about the fuel and emissions from some 100 vehicles running bumper-to-bumper nearly nonstop? Even Prop 65 warns against lingering in outdoor gas stations.

Marc Carrel, CEO of Breathe So Cal, wrote to Disneyland describing the cars' dangerous emissions as a threat not only to the lung health of Autopia employees and riders, but to people in Anaheim, Santa Ana, Orange and other local communities.

We filed a complaint about this with CARB last year. CARB never responded. So today I ask: When will CARB measure the air quality at Autopia? If it won't, how will it assure the public, Autopia employees and riders and surrounding communities that it is safe to keep Autopia running for another 30 months?

(Attached in Word file with links, as well.)

Attachment: [www.arb.ca.gov/lists/com-attach/2-may2024opencomm-UjYAb1wuWWRWNVUs.docx](http://www.arb.ca.gov/lists/com-attach/2-may2024opencomm-UjYAb1wuWWRWNVUs.docx)

Original File Name: Disneyland Autopia Ride.docx

Date and Time Comment Was Submitted: 2024-05-23 08:25:23

No Duplicates.

## **Comment 2 for Open Comment for the May 23, 2024 Board Meeting (may2024opencomm). (At Hearing)**

First Name: Jim

Last Name: Meyer

Email Address: jmeyer@aviation-repair.com

Affiliation:

Subject: CARB Chrome ATCM - One Year After

Comment:

CARB banned hard chrome plating in California in the May 2023 board meeting. The ban became law on January 1, 2024. This board meeting marks a year since the decision was made.

As a direct result of CARB's decision, Hawker Pacific Aerospace has announced closure. They employ 350 people. As an aircraft landing gear overhaul facility, a critical piece of their value chain was an in-house hard chrome plating process. A small minority of the employees work in the chrome work cell but because it is central to the entire overhaul process, and because other processes cannot be performed without it, the entire facility will be shut down. Assets will be auctioned in June.

When CARB received input from the Aerospace industry that a ban of hard chrome platers and anodizers would be highly detrimental because trivalent chrome plating was not technologically feasible, CARB's solution was to kick the can down the road by implementing "technology reviews". CARB saw this as the way to satisfy industry concerns. Industry disagreed with CARB in public comment and predicted CARB's decision would result in closures of business which are high value to the people of California and their communities in terms of wages, benefits, and infrastructure support.

CARB had a choice, it could:

- 1) ban hard chrome platers and offer to modify the ban based on future technology review, or
- 2) it could hold future reviews to inform a decision, and then ban based on the future technology review.

CARB chose to be uninformed and the rule is structured around concept 1.

So, now we see that an aerospace employer with 350 people, of whom only a couple handfuls worked in the plating operation, will close and that thousands of people (including families and other supporting businesses) in a disadvantaged community (95% CalEnviroScore 4.0) will pay the price.

The company closing the facility is based in Europe and is rated in the top quartile by a reputable environmental sustainability rating firm. They are not irresponsible operators. They utilized BACT as required by the SC AQMD. CARB failed to analyze Hawker's BACT source test in the rule making and presented data to the public which overstated emissions from the facility. As a result, there will be very little improvement in hex chrome levels in the

community at this cost of 350 jobs.

The underlying market for Hawker's services (landing gear overhaul) is very strong at present, especially with the ongoing Boeing 737 Max issues and Airbus A320 series engine issues. New aircraft are not being delivered to airlines and therefore older aircraft are in great demand. Older aircraft require landing gear overhauls. Yet, this viable aviation maintenance business is closing in California.

CARB used the statement, "there is no safe level of hex chrome emissions" to justify the knee jerk implementation of this rule. But this rule impacts less than 2% of hex chrome emitters. CARB has not taken equivalent action on the remaining 98% of hex chrome emitters over this past year. This dichotomy, urgent rhetoric about a dangerous condition, contrasted with a complete lack of CARB action tell us what we need to know. Actions speak louder than words. The urgent threat statement by CARB should not be believed. Governor Newsom's recent announcement of a new steel plant development tells us that he is also not concerned about hex chrome emissions. So why did CARB do what it did?

Does the CARB board have a learning loop in which poor decisions and the process steps which led to them are critically examined and corrected?

When will the board correct the flaws in the chrome plating ATCM?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-05-23 08:51:25

No Duplicates.

**Comment 3 for Open Comment for the May 23, 2024 Board Meeting  
(may2024opencomm). (At Hearing)**

First Name: Evan

Last Name: Edgar

Email Address: edgarinc@edgarinc.org

Affiliation:

Subject: Open Comment

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/4-may2024opencomm-Wj9WJgdnBzoGX1Qx.pdf](http://www.arb.ca.gov/lists/com-attach/4-may2024opencomm-Wj9WJgdnBzoGX1Qx.pdf)

Original File Name: Evan Edgar.pdf

Date and Time Comment Was Submitted: 2024-05-23 10:12:51

No Duplicates.

**Comment 4 for Open Comment for the May 23, 2024 Board Meeting  
(may2024opencomm). (At Hearing)**

First Name: Marc

Last Name: Carrel

Email Address: mcarrel@breathesocal.org

Affiliation: Breathe Southern California

Subject: Disneyland Autopia Ride Emissions

Comment:

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-05-23 10:56:52

No Duplicates.

**Comment 5 for Open Comment for the May 23, 2024 Board Meeting  
(may2024opencomm). (At Hearing)**

First Name: Evan

Last Name: Edgar

Email Address: edgarinc@edgarinc.org

Affiliation:

Subject: Open Comment Pt. 2

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7-may2024opencomm-AGMBaFMiVH4AWQFu.xlsx](http://www.arb.ca.gov/lists/com-attach/7-may2024opencomm-AGMBaFMiVH4AWQFu.xlsx)

Original File Name: Copy of ACF Scenarios.xlsx

Date and Time Comment Was Submitted: 2024-05-23 11:16:54

No Duplicates.