

# PUBLIC SUBMISSION

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**Docket:** MSHA-2014-0031

Exposure of Underground Miners to Diesel Exhaust

**Comment On:** MSHA-2014-0031-0076

Exposure of Underground Miners to Diesel Exhaust: Request for Information; Reopening of Rulemaking Record; Extension of Comment Period

**Document:** MSHA-2014-0031-0143

Comment from h h, NA

## Submitter Information

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## General Comment

Wildfires should be part of Carbon emissions standards. (CSAPR) , which the regulation failed to consider. States that restrict forest service work, and allow forest fuel to build up need to pay their fair share. If we add Wildfire to the cause of climate Ozone impact then we could save billions on Regulations of the wrong industries the past administration was fighting.

Environmentalists like to blame drought, but California received record-breaking rains in the winter of 2016-2017, with historic levels of tree die-off, makes you wonder who is watching the hen house.

WILDFIRES contain substantial amounts of MERCURY emissions (2 to 7 mg Hg-m<sup>-2</sup> per fire event) due to the build-up in surface material over long time periods. Large wildfires have a considerable impact on the atmospheric concentrations of CO<sub>2</sub>, CO, O<sub>3</sub>, NO<sub>x</sub>, and carbon dioxide C<sub>2</sub> carbon monoxide (CO) and METHANE (CH<sub>4</sub>) across North America. Carbon releases can be as high as 4 to 8 kg C-m<sup>-2</sup> per fire event. Wildfire emissions significantly affect concentrations far downwind. Atmospheric measurements have pointed to wildfires as a significant source of CO to the atmosphere. With CO, O<sub>3</sub>, nitrogen oxides, and equivalent black carbon show fires to be of great levels of these gas to a hemispheric scale. Large regional fire events over short time periods produce very high rates of emissions.

PAST ADMINISTRATION BACKWARD THINKING....Last year fire management alone consumed 56 percent of the USDA Forest Service's national budget. As fire suppression ( AFTER THE FIRE), costs continue to grow as a percentage of the USDA Forest Service's budget, funding is shrinking for non-fire programs( BEFORE THE FIRE STARTS), that

AB 86-COMM-86

12/15/2017

protect watersheds and restore forests, making them more resilient to wildfire and drought. Most of fire budget should be for before fires not after fires.

During summer 2004 there were times when CO from the Alaska/Canada fires exceeded anthropogenic CO in the New England region and exacerbated ozone levels as far south as Houston. Wildfire increase regional and global carbon and trace gas emissions.

Chronic litigation is hindering our Forest Service, Agriculture, Fish and wildlife, and other resource/land management professionals.

With a staggering all time high of 129 million dead trees in California along, impacts have MAJOR ISSUE on Ozone atmospheric conditions.

Government spend billions to fight oil, gas, coal, factories under the pretense of flawed reports, yet the clear and present danger is Wildfire emission CO<sub>2</sub>, CO, O<sub>3</sub>, NO<sub>x</sub>, and CH<sub>4</sub> and (PM<sub>2.5</sub>) but nothing is spend to stop the flawed ideas of not cutting and thinning old growth.

Possible shell game by Environmental activist, or global religion called diversion strategies which diverts the regulators from these serious concerns.

Estimates of NO<sub>x</sub>, formaldehyde, and glyoxal emissions from biomass burning events derived from enhancements measured by a OMI (Ozone Monitoring Instrument). The location of a particular ozone isopleth is defined by the ratio of the VOC and NO<sub>x</sub> coordinates of the point, referred to as the VOC/ NO<sub>x</sub> ratio. The VOC/NO<sub>x</sub> ratio is important in the behavior of the VOC-NO<sub>x</sub>-O<sub>3</sub> system. Moreover, it has a major effect on how reductions in VOC and NO<sub>x</sub> affect ozone concentrations. The increase in peak ozone concentration at relatively low VOC/NO<sub>x</sub> ratios that occurs when NO<sub>x</sub> is reduced has been a major issue in the development of ozone control strategies. NO<sub>x</sub> reductions will have significantly different effects depending on the particular VOC/NO<sub>x</sub> ratio, which varies significantly within an air basin

Public exposure to wildfire smoke is a concern because a large proportion of wildland fire smoke emissions is fine particulate matter (PM<sub>2.5</sub>) that can penetrate to the deepest parts of the lungs. are 2.5 micrometers in diameter or smaller, and can only be seen with an electron microscope. Fine particles are produced from all types of combustion, including residential wood burning, forest fires.

December 11, 2017 - The USDA Forest Service additional 27 million trees, died throughout California since November 2016, to an historic 129 million on 8.9 million acres.

The dead trees pose a hazard to people and critical infrastructure. The number of dead and dying trees has continued to rise, along with the risks to communities and firefighters. Regional Forester of the USDA Forest Service. California's trees remain vulnerable increased wildfire threat. The USDA Forest Service focus on mitigating hazard trees and thinning overly dense forests so they are healthier and better able to survive stressors like this in the future.

Fires are very large and often severe in many ecosystems of the region. In 2004, more than 5.8 million ha burned in Canada and Alaska, one of the largest fire year on record for the North American. Forest Service needs to stop the environmentalist for doing their job to protect the lands and people.