

Comment 1 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Ray

Last Name: Galan

Email Address: raygalan@ferrellgas.com

Affiliation: WPGA

Subject: Zero-Emission Forklift - Proposed Regulation

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/7-zeforklifts-VzpRPAAsVjEBNQEx.pdf'

Original File Name: MK-42036-Zero-EmissionForklifts-ProposedRegulation (003).pdf

Date and Time Comment Was Submitted: 2023-12-18 11:11:13

No Duplicates.

Comment 2 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Ted
Last Name: Olsen
Email Address: tedolsen@ferrellgas.com
Affiliation:

Subject: ZEForklifts
Comment:

See attached letter.

Attachment: 'www.arb.ca.gov/lists/com-attach/8-zeforklifts-AG0Ga1xwAmUGMgMz.pdf'

Original File Name: MK-42036-Zero-EmissionForklifts-ProposedRegulation.pdf

Date and Time Comment Was Submitted: 2023-12-18 11:26:29

No Duplicates.

Comment 3 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: TODD

Last Name: PEACHEY

Email Address: toddpeachey@ferrellgas.com

Affiliation: FERRELLGAS.INC.

Subject: ZERO -EMISSION FORKLIFT REGULATION

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/9-zeforklifts-VTkGZVYjWH8CYQI7.pdf'

Original File Name: LETTER.pdf

Date and Time Comment Was Submitted: 2023-12-18 11:34:46

No Duplicates.

Comment 4 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Jeff

Last Name: STICLARU

Email Address: jeffreysticlaru@ferrellgas.com

Affiliation: Ferrellgas Propane

Subject: CARB

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/10-zeforklifts-UD1TPld7BWIANFdn.pdf'

Original File Name: MK-42036-Zero-EmissionForklifts-ProposedRegulation.pdf

Date and Time Comment Was Submitted: 2023-12-18 11:39:25

No Duplicates.

Comment 5 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Drew

Last Name: Hensler

Email Address: drewhensler@ferrellgas.com

Affiliation:

Subject: Forklift Regulation

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/11-zeforklifts-BWhcMVR4BGMANAaw.docx'

Original File Name: MK-42036-Zero-EmissionForklifts-ProposedRegulation.docx

Date and Time Comment Was Submitted: 2023-12-18 11:46:29

No Duplicates.

Comment 6 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Reginald
Last Name: Caldwell
Email Address: reginaldcaldwell@ferrellgas.com
Affiliation:

Subject: Propane
Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/12-zeforklifts-WzYHalZ6UTYANAg4.pdf'

Original File Name: MK-42036-Zero-EmissionForklifts-ProposedRegulation.pdf

Date and Time Comment Was Submitted: 2023-12-18 12:02:02

No Duplicates.

Comment 7 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Robert

Last Name: Lagge

Email Address: robertlagge@ferrellgas.com

Affiliation: Ferrellgas

Subject: Save ICE forklifts

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/13-zeforklifts-Am9RPFJ+UTZXYwAw.docx'

Original File Name: MK-42036-Zero-EmissionForklifts-ProposedRegulation.docx

Date and Time Comment Was Submitted: 2023-12-18 11:56:26

No Duplicates.

Comment 8 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Julie

Last Name: Johnson

Email Address: juliejohnson@tedjohnsonpropane.com

Affiliation:

Subject: Public Comments RE: ZE Forklift Regulation

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/14-zeforklifts-UDwCYVUgUXYFZgl7.pdf'

Original File Name: Letter To CARB ZE Forklift Rulemaking.pdf

Date and Time Comment Was Submitted: 2023-12-18 12:22:20

No Duplicates.

Comment 9 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Lora

Last Name: Brazil

Email Address: lorabrazil@ferrellgas.com

Affiliation:

Subject: Zero Emission Forklift Regulation

Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/15-zeforklifts-WjdUOVd7A2QBNQg4.pdf'

Original File Name: MK-42036-Zero-EmissionForklifts-ProposedRegulation.pdf

Date and Time Comment Was Submitted: 2023-12-18 12:42:19

No Duplicates.

Comment 10 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Bryan

Last Name: Heath

Email Address: bryanheath@ferrellgas.com

Affiliation:

Subject: Zero Emission Forklift

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/16-zeforklifts-Uz5UOVV5VzBXY1Vl.pdf'

Original File Name: MK-42036-Zero-EmissionForklifts-ProposedRegulation.pdf

Date and Time Comment Was Submitted: 2023-12-18 12:48:04

No Duplicates.

Comment 11 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Craig

Last Name: Rodgers

Email Address: craigrodgers@ferrellgas.com

Affiliation:

Subject: zero emission forklift

Comment:

Attachment: "

Original File Name: MK-42036-Zero-EmissionForklifts-ProposedRegulation (003).docx

Date and Time Comment Was Submitted: 2023-12-18 12:58:36

No Duplicates.

Comment 12 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Bob

Last Name: Shepherd

Email Address: bshepherd@quinncompany.com

Affiliation: The California Caterpillar Dealers

Subject: Proposed Zero-Emission Forklift (ZEF) Regulation – Many Unresolved Issues

Comment:

See attached letter explaining many unresolved issues and regulatory conflicts.

Attachment: 'www.arb.ca.gov/lists/com-attach/18-zeforklifts-Uy1QMwZ1V2sKIQFk.pdf'

Original File Name: Zero-Emission Forklift March 2023 Draft Comments Dec 18.pdf

Date and Time Comment Was Submitted: 2023-12-18 13:30:38

No Duplicates.

Comment 13 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Tom

Last Name: Boerum

Email Address: tomboerum@mutualpropane.com

Affiliation: MUTUAL LIQUID GAS INC

Subject: Zero-Emission Forklifts – Proposed Regulation

Comment:

Please see attachment.

Attachment: 'www.arb.ca.gov/lists/com-attach/19-zeforklifts-AmFQN10uBzYHXgJu.pdf'

Original File Name: carb Letter ZE Forklift FINAL.pdf

Date and Time Comment Was Submitted: 2023-12-18 14:07:22

No Duplicates.

Comment 14 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Geoff

Last Name: Moore

Email Address: Geoff@mutualpropane.com

Affiliation: MUTUAL LIQUID GAS INC

Subject: Zero-Emission Forklifts – Proposed Regulation

Comment:

Please see attachment.

Attachment: 'www.arb.ca.gov/lists/com-attach/20-zeforklifts-UzBRNIYIUWBWDwNv.pdf'

Original File Name: carb Letter ZE Forklift FINAL geoff.pdf

Date and Time Comment Was Submitted: 2023-12-18 14:13:08

No Duplicates.

Comment 15 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Jennifer

Last Name: Bush

Email Address: jenibush@ferrellgas.com

Affiliation:

Subject: ZE Forklifts

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/21-zeforklifts-BWhSP1F9A2QBNQU1.docx'

Original File Name: MK-42036-Zero-EmissionForklifts-ProposedRegulation.docx

Date and Time Comment Was Submitted: 2023-12-18 14:38:07

No Duplicates.

Comment 16 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Michael
Last Name: Huber
Email Address: michael.j.huber20.civ@us.navy.mil
Affiliation: U.S. Department of Defense

Subject: DoD Zero Emission Forklift Comments 18Dec2023
Comment:

ARB,

Attached are the DoD comments on the Zero Emission Forklift regulations.

V/R,

Michael Huber, P.E.
DoD Regional Environmental Coordination (DoD REC 9) Program Manager

750 Pacific Highway, Box 81
San Diego, CA 92132

Attachment: 'www.arb.ca.gov/lists/com-attach/22-zeforklifts-VDBWPwZjAg4He1I3.pdf'

Original File Name: DoD Zero Emission Forklift comments 18Dec2023.pdf

Date and Time Comment Was Submitted: 2023-12-18 17:35:06

No Duplicates.

Comment 17 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Jordan

Last Name: Horn

Email Address: jordanhorn@ferrellgas.com

Affiliation: Ferrellgas LP

Subject: Zero Emission Forklift Policy

Comment:

attached

Attachment: 'www.arb.ca.gov/lists/com-attach/23-zeforklifts-AWxdMFF9UDcHMwk5.docx'

Original File Name: MK-42036-Zero-EmissionForklifts-ProposedRegulation.docx

Date and Time Comment Was Submitted: 2023-12-19 07:32:51

No Duplicates.

Comment 18 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Christopher

Last Name: Kentzell

Email Address: chriskentzell@ferrellgas.com

Affiliation:

Subject: forklift regulation

Comment:

against zero emission for forklifts

Attachment: 'www.arb.ca.gov/lists/com-attach/24-zeforklifts-VDIUOVV5WT4BNVBg.pdf'

Original File Name: MK-42036-Zero-EmissionForklifts-ProposedRegulation.pdf

Date and Time Comment Was Submitted: 2023-12-19 09:36:07

No Duplicates.

Comment 19 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Jose

Last Name: Rodriguez

Email Address: jose@mutualpropane.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

Propane-powered forklifts are the more affordable fuel option: ICE forklift fuel costs decrease substantially when propane fuel costs

are utilized. When propane is used as the fuel of choice for ICE forklifts, ICE forklift fuel costs go down by approximately 55%. Cumulative fuel savings when using propane add up to \$1.87 billion, while cumulative fuel savings when using gasoline amount to \$5.25 billion. Utilizing propane as the main source of fuel for ICE forklifts provides a more accurate depiction of ICE forklift fuel costs as the majority of forklifts are propane-powered. Considering that the fuel savings generated by CARB make up approximately 47% (\$8.2 billion) of CARB's cumulative regulation benefits, transparency on their fuel cost methodology is essential.

Renewable propane drastically reduces GHG emissions without significant financial investment: The propane industry has made extraordinary strides to expand production of low carbon renewable fuels for the transportation sector within California. These strides have been made in part thanks to the work of CARB in its implementation of the Low Carbon Fuel Standard. Renewable propane carbon intensities range from half- to one-quarter of the carbon intensity of California's current electric grid. With current blending and transitions to all-renewable fuels, propane has outpaced carbon emissions for California's electric sector in transportation - particularly off-road forklifts.

I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Jose Rodriguez
17117 S Broadway
Gardena, CA 90248

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-19 15:21:27

No Duplicates.

Comment 20 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Steve

Last Name: Maldonado

Email Address: firestrm54@gmail.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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Renewable propane drastically reduces GHG emissions without significant financial investment: The propane industry has made extraordinary strides to expand production of low carbon renewable fuels for the transportation sector within California. These strides have been made in part thanks to the work of CARB in its implementation of the Low Carbon Fuel Standard. Renewable propane carbon intensities range from half- to one-quarter of the carbon intensity of California's current electric grid. With current blending and transitions to all-renewable fuels, propane has outpaced carbon emissions for California's electric sector in transportation - particularly off-road forklifts.

I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Steve Maldonado
31691 Leather Wood Dr
Winchester, CA 92596

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-19 15:24:28

No Duplicates.

Comment 21 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Salvador

Last Name: Pena

Email Address: salvadorpena@ferrellgas.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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Renewable propane drastically reduces GHG emissions without significant financial investment: The propane industry has made extraordinary strides to expand production of low carbon renewable fuels for the transportation sector within California. These strides have been made in part thanks to the work of CARB in its implementation of the Low Carbon Fuel Standard. Renewable propane carbon intensities range from half- to one-quarter of the carbon intensity of California's current electric grid. With current blending and transitions to all-renewable fuels, propane has outpaced carbon emissions for California's electric sector in transportation - particularly off-road forklifts.

I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Salvador Peña
8088 Miramar Rd
San Diego, CA 92126

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-19 16:03:53

No Duplicates.

Comment 22 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Chris

Last Name: Hall

Email Address: chrishall24jack@gmail.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Chris Hall
12283 Elizabeth Way
Grass Valley, CA 95949

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-19 16:08:06

No Duplicates.

Comment 23 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Cassie

Last Name: Cesena

Email Address: cassiecesena@gmail.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Cassie Cesena
16 S 36th Pl
Long Beach, CA 90803

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-19 16:10:11

No Duplicates.

Comment 24 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Skyler

Last Name: Castro

Email Address: s.lagreasesolutions@gmail.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

Propane-powered forklifts are the more affordable fuel option: ICE forklift fuel costs decrease substantially when propane fuel costs

are utilized. When propane is used as the fuel of choice for ICE forklifts, ICE forklift fuel costs go down by approximately 55%. Cumulative fuel savings when using propane add up to \$1.87 billion, while cumulative fuel savings when using gasoline amount to \$5.25 billion. Utilizing propane as the main source of fuel for ICE forklifts provides a more accurate depiction of ICE forklift fuel costs as the majority of forklifts are propane-powered. Considering that the fuel savings generated by CARB make up approximately 47% (\$8.2 billion) of CARB's cumulative regulation benefits, transparency on their fuel cost methodology is essential.

Renewable propane drastically reduces GHG emissions without significant financial investment: The propane industry has made extraordinary strides to expand production of low carbon renewable fuels for the transportation sector within California. These strides have been made in part thanks to the work of CARB in its implementation of the Low Carbon Fuel Standard. Renewable propane carbon intensities range from half- to one-quarter of the carbon intensity of California's current electric grid. With current blending and transitions to all-renewable fuels, propane has outpaced carbon emissions for California's electric sector in transportation - particularly off-road forklifts.

I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Skyler Castro
6711 McKinley Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-19 16:12:32

No Duplicates.

Comment 25 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Bryce

Last Name: Wheatley

Email Address: bryce@powertriprentals.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Bryce Wheatley
2501 Orange Ave
Signal Hill, CA 90755

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-19 16:14:27

No Duplicates.

Comment 26 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Eddie

Last Name: Chen

Email Address: eddie.chen@potentialindustries.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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are utilized. When propane is used as the fuel of choice for ICE forklifts, ICE forklift fuel costs go down by approximately 55%. Cumulative fuel savings when using propane add up to \$1.87 billion, while cumulative fuel savings when using gasoline amount to \$5.25 billion. Utilizing propane as the main source of fuel for ICE forklifts provides a more accurate depiction of ICE forklift fuel costs as the majority of forklifts are propane-powered. Considering that the fuel savings generated by CARB make up approximately 47% (\$8.2 billion) of CARB's cumulative regulation benefits, transparency on their fuel cost methodology is essential.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Eddie Chen
720 East E Street
Los Angeles, CA 90744

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-19 16:16:05

No Duplicates.

Comment 27 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Zuzel

Last Name: Vasquez

Email Address: zuzel@kingfiotrucking.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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are utilized. When propane is used as the fuel of choice for ICE forklifts, ICE forklift fuel costs go down by approximately 55%. Cumulative fuel savings when using propane add up to \$1.87 billion, while cumulative fuel savings when using gasoline amount to \$5.25 billion. Utilizing propane as the main source of fuel for ICE forklifts provides a more accurate depiction of ICE forklift fuel costs as the majority of forklifts are propane-powered. Considering that the fuel savings generated by CARB make up approximately 47% (\$8.2 billion) of CARB's cumulative regulation benefits, transparency on their fuel cost methodology is essential.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Zuzel Vasquez
5059 Boxford Ave
Commerce, CA 90040

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-19 16:19:09

No Duplicates.

Comment 28 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Sandro

Last Name: Solorzano

Email Address: sandro@mutualpropane.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Sandro Solorzano
17117 S Broadway
Gardena, CA 90248

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-19 16:20:56

No Duplicates.

Comment 29 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Scott

Last Name: Carr

Email Address: scott@mutualpropane.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Scott Carr
2243 McNeil Cir
Corona, CA 92882

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-19 16:22:35

No Duplicates.

Comment 30 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Ramon

Last Name: Diaz

Email Address: ramon@mutualpropane.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Ramon Diaz
17117 S Broadway
Gardena, CA 90248

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-19 16:23:58

No Duplicates.

Comment 31 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Laura

Last Name: Sample

Email Address: laurasample2@gmail.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

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Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Laura Sample
557 E Cypress Ave
Glendora, CA 91741

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-19 16:25:36

No Duplicates.

Comment 32 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: David

Last Name: Pedersen

Email Address: djtpedersen@gmail.com

Affiliation: Bay Area Clean Air Coalition (Unofficial

Subject: Comment on "Notice of Public Hearing to Consider Proposed Zero-Emission Forklift..."

Comment:

Thank you for the opportunity to submit a comment on this proposed regulation.

I am a Canadian clean-air activist and I work part-time at a facility where forklifts are used frequently and I am well aware of the air and noise pollution they create. I believe that this regulation, if implemented as proposed, will solve those two problems and help improve economic productivity as a co-benefit.

I urge the Board to adopt the regulation as proposed and do as much as possible to accelerate the transition to electric forklifts in all sectors in California.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 01:44:04

No Duplicates.

Comment 33 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Jose

Last Name: Cardiel

Email Address: j.cardiel@bestbaytrucking.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

Propane-powered forklifts are the more affordable fuel option: ICE forklift fuel costs decrease substantially when propane fuel costs

are utilized. When propane is used as the fuel of choice for ICE forklifts, ICE forklift fuel costs go down by approximately 55%. Cumulative fuel savings when using propane add up to \$1.87 billion, while cumulative fuel savings when using gasoline amount to \$5.25 billion. Utilizing propane as the main source of fuel for ICE forklifts provides a more accurate depiction of ICE forklift fuel costs as the majority of forklifts are propane-powered. Considering that the fuel savings generated by CARB make up approximately 47% (\$8.2 billion) of CARB's cumulative regulation benefits, transparency on their fuel cost methodology is essential.

Renewable propane drastically reduces GHG emissions without significant financial investment: The propane industry has made extraordinary strides to expand production of low carbon renewable fuels for the transportation sector within California. These strides have been made in part thanks to the work of CARB in its implementation of the Low Carbon Fuel Standard. Renewable propane carbon intensities range from half- to one-quarter of the carbon intensity of California's current electric grid. With current blending and transitions to all-renewable fuels, propane has outpaced carbon emissions for California's electric sector in transportation - particularly off-road forklifts.

I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Jose Cardiel
620 E Anaheim St
Los Angeles, CA 90744

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:07:12

No Duplicates.

Comment 34 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Michael
Last Name: Biazevich
Email Address: mbiazevich@pcmcus.com
Affiliation:

Subject: ZE Forklift Regulation
Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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Renewable propane drastically reduces GHG emissions without significant financial investment: The propane industry has made extraordinary strides to expand production of low carbon renewable fuels for the transportation sector within California. These strides have been made in part thanks to the work of CARB in its implementation of the Low Carbon Fuel Standard. Renewable propane carbon intensities range from half- to one-quarter of the carbon intensity of California's current electric grid. With current blending and transitions to all-renewable fuels, propane has outpaced carbon emissions for California's electric sector in transportation - particularly off-road forklifts.

I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Michael Biazevich
250 W Wardlow Rd
Long Beach, CA 90807

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:08:19

No Duplicates.

Comment 35 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Kaz

Last Name: Tsujimoto

Email Address: kaz.tsujimoto@mercedes-benz.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Kaz Tsujimoto
4031 Via Oro Ave
Long Beach, CA 90810

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:10:10

No Duplicates.

Comment 36 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Carolina

Last Name: Chavez

Email Address: marketing@falconfuelsinc.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Carolina Chavez
7300 Alondra Blvd
Paramount, CA 90723

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:11:45

No Duplicates.

Comment 37 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Juan

Last Name: Del Real

Email Address: juan@refrigeranthandling.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

Propane-powered forklifts are the more affordable fuel option: ICE forklift fuel costs decrease substantially when propane fuel costs

are utilized. When propane is used as the fuel of choice for ICE forklifts, ICE forklift fuel costs go down by approximately 55%. Cumulative fuel savings when using propane add up to \$1.87 billion, while cumulative fuel savings when using gasoline amount to \$5.25 billion. Utilizing propane as the main source of fuel for ICE forklifts provides a more accurate depiction of ICE forklift fuel costs as the majority of forklifts are propane-powered. Considering that the fuel savings generated by CARB make up approximately 47% (\$8.2 billion) of CARB's cumulative regulation benefits, transparency on their fuel cost methodology is essential.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Juan Del Real
5016 Calmview Ave
Baldwin Park, CA 91706

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:12:37

No Duplicates.

Comment 38 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Javier

Last Name: Alfaro

Email Address: jalfaro@decostonedesign.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Javier Alfaro
227 E Bristol Ln
Orange, CA 92865

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:13:32

No Duplicates.

Comment 39 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Brian

Last Name: Harms

Email Address: b.harms@lane-aire.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Brian Harms
1121 California Ave
Corona, CA 92881

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:14:56

No Duplicates.

Comment 40 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Authur

Last Name: Distin

Email Address: office@semblylinesales.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Arthur Distin
12075 Clark St
Santa Fe Springs, CA 90670

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:15:53

No Duplicates.

Comment 41 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Robert

Last Name: Stevens

Email Address: robert@gvsca.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Robert Stevens
1545 W Roosevelt St
Azusa, CA 91702

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:17:04

No Duplicates.

Comment 42 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Lisa

Last Name: Harris

Email Address: lisa@lsmh.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

Propane-powered forklifts are the more affordable fuel option: ICE forklift fuel costs decrease substantially when propane fuel costs

are utilized. When propane is used as the fuel of choice for ICE forklifts, ICE forklift fuel costs go down by approximately 55%. Cumulative fuel savings when using propane add up to \$1.87 billion, while cumulative fuel savings when using gasoline amount to \$5.25 billion. Utilizing propane as the main source of fuel for ICE forklifts provides a more accurate depiction of ICE forklift fuel costs as the majority of forklifts are propane-powered. Considering that the fuel savings generated by CARB make up approximately 47% (\$8.2 billion) of CARB's cumulative regulation benefits, transparency on their fuel cost methodology is essential.

Renewable propane drastically reduces GHG emissions without significant financial investment: The propane industry has made extraordinary strides to expand production of low carbon renewable fuels for the transportation sector within California. These strides have been made in part thanks to the work of CARB in its implementation of the Low Carbon Fuel Standard. Renewable propane carbon intensities range from half- to one-quarter of the carbon intensity of California's current electric grid. With current blending and transitions to all-renewable fuels, propane has outpaced carbon emissions for California's electric sector in transportation - particularly off-road forklifts.

I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Lisa Harris
12733 San Fernando Rd
Los Angeles, CA 91342

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:18:25

No Duplicates.

Comment 43 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Gregg

Last Name: Krekeler

Email Address: gregg.krekeler@tubularsteel.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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Renewable propane drastically reduces GHG emissions without significant financial investment: The propane industry has made extraordinary strides to expand production of low carbon renewable fuels for the transportation sector within California. These strides have been made in part thanks to the work of CARB in its implementation of the Low Carbon Fuel Standard. Renewable propane carbon intensities range from half- to one-quarter of the carbon intensity of California's current electric grid. With current blending and transitions to all-renewable fuels, propane has outpaced carbon emissions for California's electric sector in transportation - particularly off-road forklifts.

I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Gregg Krekeler
2750 N Locust Ave
Rialto, CA 92377

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:19:33

No Duplicates.

Comment 44 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Richard
Last Name: Rice
Email Address: rick@rrsigns.com
Affiliation:

Subject: ZE Forklift Regulation
Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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Renewable propane drastically reduces GHG emissions without significant financial investment: The propane industry has made extraordinary strides to expand production of low carbon renewable fuels for the transportation sector within California. These strides have been made in part thanks to the work of CARB in its implementation of the Low Carbon Fuel Standard. Renewable propane carbon intensities range from half- to one-quarter of the carbon intensity of California's current electric grid. With current blending and transitions to all-renewable fuels, propane has outpaced carbon emissions for California's electric sector in transportation - particularly off-road forklifts.

I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Richard Rice
400 W Foothill Blvd Ste 130
Glendora, CA 91741

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:20:36

No Duplicates.

Comment 45 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Dan

Last Name: Guerrero

Email Address: dan@willick.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Dan Guerrero
12516 Lakeland Rd
Santa Fe Springs, CA 90670

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:22:25

No Duplicates.

Comment 46 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Donald

Last Name: Harms

Email Address: dharms@lane-aire.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

Propane-powered forklifts are the more affordable fuel option: ICE forklift fuel costs decrease substantially when propane fuel costs

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Donald Harms
1121 California Ave
Buena Park, CA 90623

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:23:34

No Duplicates.

Comment 47 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: James

Last Name: Probst

Email Address: jprobst@profabtech.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
James Probst
970 W Foothill Blvd
Azusa, CA 91702

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:24:35

No Duplicates.

Comment 48 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Mark

Last Name: Miedema

Email Address: mmiedema@encorrsheets.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Mark Miedema
5171 E Francis St
Ontario, CA 91761

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:25:38

No Duplicates.

Comment 49 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Heidi

Last Name: Strand

Email Address: strandssf@aol.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Heidi Strand
315 S Richman Ave
Fullerton, CA 92832

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:26:40

No Duplicates.

Comment 50 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Edward

Last Name: Dart

Email Address: darthere@yahoo.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Edward Dart
151 N Cielito Lindo
Anaheim, CA 92807

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:27:43

No Duplicates.

Comment 51 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Jim

Last Name: Smaaladen

Email Address: jim@bryantracing.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

Propane-powered forklifts are the more affordable fuel option: ICE forklift fuel costs decrease substantially when propane fuel costs

are utilized. When propane is used as the fuel of choice for ICE forklifts, ICE forklift fuel costs go down by approximately 55%. Cumulative fuel savings when using propane add up to \$1.87 billion, while cumulative fuel savings when using gasoline amount to \$5.25 billion. Utilizing propane as the main source of fuel for ICE forklifts provides a more accurate depiction of ICE forklift fuel costs as the majority of forklifts are propane-powered. Considering that the fuel savings generated by CARB make up approximately 47% (\$8.2 billion) of CARB's cumulative regulation benefits, transparency on their fuel cost methodology is essential.

Renewable propane drastically reduces GHG emissions without significant financial investment: The propane industry has made extraordinary strides to expand production of low carbon renewable fuels for the transportation sector within California. These strides have been made in part thanks to the work of CARB in its implementation of the Low Carbon Fuel Standard. Renewable propane carbon intensities range from half- to one-quarter of the carbon intensity of California's current electric grid. With current blending and transitions to all-renewable fuels, propane has outpaced carbon emissions for California's electric sector in transportation - particularly off-road forklifts.

I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Jim Smaaladen
1600 E Winston Rd
Anaheim, CA 92806

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:29:21

No Duplicates.

Comment 52 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Johnson

Last Name: Xu

Email Address: accounting@taskgloves.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

Propane-powered forklifts are the more affordable fuel option: ICE forklift fuel costs decrease substantially when propane fuel costs

are utilized. When propane is used as the fuel of choice for ICE forklifts, ICE forklift fuel costs go down by approximately 55%. Cumulative fuel savings when using propane add up to \$1.87 billion, while cumulative fuel savings when using gasoline amount to \$5.25 billion. Utilizing propane as the main source of fuel for ICE forklifts provides a more accurate depiction of ICE forklift fuel costs as the majority of forklifts are propane-powered. Considering that the fuel savings generated by CARB make up approximately 47% (\$8.2 billion) of CARB's cumulative regulation benefits, transparency on their fuel cost methodology is essential.

Renewable propane drastically reduces GHG emissions without significant financial investment: The propane industry has made extraordinary strides to expand production of low carbon renewable fuels for the transportation sector within California. These strides have been made in part thanks to the work of CARB in its implementation of the Low Carbon Fuel Standard. Renewable propane carbon intensities range from half- to one-quarter of the carbon intensity of California's current electric grid. With current blending and transitions to all-renewable fuels, propane has outpaced carbon emissions for California's electric sector in transportation - particularly off-road forklifts.

I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Johnson Xu
15265 Don Julian Rd
City Of Industry, CA 91745

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:30:28

No Duplicates.

Comment 53 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Robert

Last Name: Mazawey

Email Address: bobmazawey@gmail.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Robert Mazawey
754 Great Bend Dr
Diamond Bar, CA 91765

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:31:38

No Duplicates.

Comment 54 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Phillip

Last Name: Hernandez

Email Address: phernandez@encorrsheets.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Phillip Hernandez
5171 E Francis St
Ontario, CA 91761

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:32:46

No Duplicates.

Comment 55 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Sissy

Last Name: Funk

Email Address: sissy@polishusa.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Sissy Funk
1830 California Ave
Monrovia, CA 91016

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:33:47

No Duplicates.

Comment 56 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Melissa

Last Name: Lomenzo

Email Address: socialmedia@heartofcompassionca.org

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Melissa Lomenzo
600 S Maple Ave
Montebello, CA 90640

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:35:02

No Duplicates.

Comment 57 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Louis

Last Name: Smith

Email Address: lxsmith@encorrsheets.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Louis Smith
5171 E Francis St
Ontario, CA 91761

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:36:04

No Duplicates.

Comment 58 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: David

Last Name: Hwang

Email Address: ductilic@yahoo.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
David Hwang
13826 Struikman Rd
Cerritos, CA 90703

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:37:02

No Duplicates.

Comment 59 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Bill

Last Name: Borden

Email Address: hopeplastics@la.twcbc.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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Propane-powered forklifts are the more affordable fuel option: ICE forklift fuel costs decrease substantially when propane fuel costs

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Renewable propane drastically reduces GHG emissions without significant financial investment: The propane industry has made extraordinary strides to expand production of low carbon renewable fuels for the transportation sector within California. These strides have been made in part thanks to the work of CARB in its implementation of the Low Carbon Fuel Standard. Renewable propane carbon intensities range from half- to one-quarter of the carbon intensity of California's current electric grid. With current blending and transitions to all-renewable fuels, propane has outpaced carbon emissions for California's electric sector in transportation - particularly off-road forklifts.

I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Bill Borden
5353 Strohm Ave
Los Angeles, CA 91601

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:38:07

No Duplicates.

Comment 60 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Stephen

Last Name: Coonen

Email Address: surfaceconstructorsinc@yahoo.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Stephen Coonen
2287 Ahuacate Rd
La Habra Heights, CA 90631

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:39:10

No Duplicates.

Comment 61 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Eddie

Last Name: Wilson

Email Address: eddiewilson1987@gmail.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Eddie Wilson
9522 Placer St
Rancho Cucamonga, CA 91730

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:40:04

No Duplicates.

Comment 62 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Lydia

Last Name: Rutherford

Email Address: lydia@brandxmetals.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Lydia Rutherford
1641 Sinclair St
Anaheim, CA 92806

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:41:08

No Duplicates.

Comment 63 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Rene

Last Name: Tsang

Email Address: ap@landmannwire.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

Propane-powered forklifts are the more affordable fuel option: ICE forklift fuel costs decrease substantially when propane fuel costs

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Rene Tsang
430 E Trimble Rd
San Jose, CA 95131

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:42:14

No Duplicates.

Comment 64 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Lisa

Last Name: Van Den Berg

Email Address: lisa@dfindustries.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Lisa Van Den Berg
5071 Lindsay Ct
Chino, CA 91710

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:43:07

No Duplicates.

Comment 65 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Todd

Last Name: Greco

Email Address: toddg@plasticmaterials.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Todd Greco
4202 E Brickell St
Ontario, CA 91761

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:44:13

No Duplicates.

Comment 66 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Vinod

Last Name: Nanda

Email Address: vinodnanda43@gmail.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Vinod Nanda
132 Stagecoach Rd
Bell Canyon, CA 91307

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:45:07

No Duplicates.

Comment 67 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Manuel

Last Name: Gamboa

Email Address: manuelydelta@yahoo.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Manuel Gamboa
1436 Packard Dr Apt A
Pomona, CA 91766

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:47:39

No Duplicates.

Comment 68 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: John

Last Name: Simpson

Email Address: john@aaapropaneservice.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

Propane-powered forklifts are the more affordable fuel option: ICE forklift fuel costs decrease substantially when propane fuel costs

are utilized. When propane is used as the fuel of choice for ICE forklifts, ICE forklift fuel costs go down by approximately 55%. Cumulative fuel savings when using propane add up to \$1.87 billion, while cumulative fuel savings when using gasoline amount to \$5.25 billion. Utilizing propane as the main source of fuel for ICE forklifts provides a more accurate depiction of ICE forklift fuel costs as the majority of forklifts are propane-powered. Considering that the fuel savings generated by CARB make up approximately 47% (\$8.2 billion) of CARB's cumulative regulation benefits, transparency on their fuel cost methodology is essential.

Renewable propane drastically reduces GHG emissions without significant financial investment: The propane industry has made extraordinary strides to expand production of low carbon renewable fuels for the transportation sector within California. These strides have been made in part thanks to the work of CARB in its implementation of the Low Carbon Fuel Standard. Renewable propane carbon intensities range from half- to one-quarter of the carbon intensity of California's current electric grid. With current blending and transitions to all-renewable fuels, propane has outpaced carbon emissions for California's electric sector in transportation - particularly off-road forklifts.

I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
John Simpson
2954 Seahorse Ave
Ventura, CA 93001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:48:57

No Duplicates.

Comment 69 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Dan

Last Name: Chilson

Email Address: danc@classicdist.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Dan Chilson
120 Puente Ave
City Of Industry, CA 91746

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:49:58

No Duplicates.

Comment 70 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Ian

Last Name: Price

Email Address: ian@carrhill.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Ian Price
8420 Elder Creek Rd
Sacramento, CA 95828

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:50:54

No Duplicates.

Comment 71 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Jack

Last Name: Rudolf

Email Address: yvonne@jacksbutane.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Jack Rudolf
PO Box 248
Biola, CA 93606

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:52:53

No Duplicates.

Comment 72 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Clayton

Last Name: Manha

Email Address: clayton@jacksbutane.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

Propane-powered forklifts are the more affordable fuel option: ICE forklift fuel costs decrease substantially when propane fuel costs

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Clayton Manha
15602 W San Joaquin Ave
Kerman, CA 93630

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:53:55

No Duplicates.

Comment 73 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Yvonne

Last Name: Rudolf

Email Address: yrudolf59@hotmail.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Yvonne Rudolf
486 S 3rd St
Kerman, CA 93630

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:54:51

No Duplicates.

Comment 74 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Austin

Last Name: Davidson

Email Address: austin.davidson@midstreamenergy.us

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Austin Davidson
9224 Tupman Rd
Tupman, CA 93276

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:55:50

No Duplicates.

Comment 75 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Nancy

Last Name: Coop

Email Address: nancyjcoop@gmail.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Nancy Coop
34311 Street of the Violet Lantern
Dana Point, CA 92629

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:56:49

No Duplicates.

Comment 76 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: William

Last Name: Platz

Email Address: meamdle2@gmail.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
William Platz
6515 Kathryn Dr
Cambria, CA 93428

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:57:43

No Duplicates.

Comment 77 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Alexandria

Last Name: Wahaus

Email Address: alexandriawahaus@tedjohnsonpropane.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

Propane-powered forklifts are the more affordable fuel option: ICE forklift fuel costs decrease substantially when propane fuel costs

are utilized. When propane is used as the fuel of choice for ICE forklifts, ICE forklift fuel costs go down by approximately 55%. Cumulative fuel savings when using propane add up to \$1.87 billion, while cumulative fuel savings when using gasoline amount to \$5.25 billion. Utilizing propane as the main source of fuel for ICE forklifts provides a more accurate depiction of ICE forklift fuel costs as the majority of forklifts are propane-powered. Considering that the fuel savings generated by CARB make up approximately 47% (\$8.2 billion) of CARB's cumulative regulation benefits, transparency on their fuel cost methodology is essential.

Renewable propane drastically reduces GHG emissions without significant financial investment: The propane industry has made extraordinary strides to expand production of low carbon renewable fuels for the transportation sector within California. These strides have been made in part thanks to the work of CARB in its implementation of the Low Carbon Fuel Standard. Renewable propane carbon intensities range from half- to one-quarter of the carbon intensity of California's current electric grid. With current blending and transitions to all-renewable fuels, propane has outpaced carbon emissions for California's electric sector in transportation - particularly off-road forklifts.

I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Alexandria Wahaus
5140 Elton St
Baldwin Park, CA 91706

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:58:35

No Duplicates.

Comment 78 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Armando

Last Name: Alfonso

Email Address: armando@southwestprocessors.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

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Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Armando Alfonso
4120 Bandini Blvd
Vernon, CA 90058

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 17:59:40

No Duplicates.

Comment 79 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Cynthia

Last Name: Belmont

Email Address: cindyb@deltaliquidenergy.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Cynthia Belmont
2225 Iron Stone Loop
Templeton, CA 93465

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 18:03:44

No Duplicates.

Comment 80 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Tim
Last Name: Gately
Email Address: tim.gately@gmail.com
Affiliation:

Subject: ZE Forklift Regulation
Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Tim Gately
1574 Waller St
San Francisco, CA 94117

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-20 18:05:19

No Duplicates.

Comment 81 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Will

Last Name: Barrett

Email Address: william.barrett@lung.or

Affiliation:

Subject: Comment

Comment:

Please see attached file.

Attachment: 'www.arb.ca.gov/lists/com-attach/87-zeforklifts-UCdWOVE8Aj1WOVQ1.pdf'

Original File Name: williambarrett.pdf

Date and Time Comment Was Submitted: 2023-12-21 09:43:18

No Duplicates.

Comment 82 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Ashley
Last Name: Hong
Email Address: ahong@cmta.net
Affiliation: CMTA

Subject: CMTA Comments on the ZEF Regulation
Comment:

CMTA's comment letter on the proposed Zero-emission Forklift (ZEF) regulation is attached for your review and submission. Please do not hesitate to reach out if you have any questions. We appreciate your consideration and look forward to discussing this further.

Happy Holidays!
Best,

Ashley Hong
Legislative Analyst

p: 916.498.3328 f: 916.441.5449
a: 1121 L Street, Suite 700, Sacramento, CA 95814
e: ahong@cmta.net w: www.cmta.net

Attachment: 'www.arb.ca.gov/lists/com-attach/88-zeforklifts-AWJQO1AIVmQBWFd6.pdf'

Original File Name: CMTA - ZEF Comments 12.21.23 (FINAL).pdf

Date and Time Comment Was Submitted: 2023-12-21 16:29:44

No Duplicates.

Comment 83 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Michael

Last Name: Lewis

Email Address: mike@lewisandco.net

Affiliation: Construction Ind. Air Quality Coalition

Subject: Forklift rule 45 day comments

Comment:

Please post these comments from the Construction Industry Air Quality Coalition on the latest version of the zero emission forklift rule.

Attachment: 'www.arb.ca.gov/lists/com-attach/89-zeforklifts-UDNUOwdnVXdSNwhX.docx'

Original File Name: CIAQC Zero Emission Forklift Proposed Regulation Comments .docx

Date and Time Comment Was Submitted: 2023-12-21 17:16:55

No Duplicates.

Comment 84 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Kristel

Last Name: Rietesel

Email Address: krietesel@hotmail.com

Affiliation: Bay Area Clean Air Coalition

Subject: Support of proposal

Comment:

We support this proposal and ask that the Board pushes for a complete transition to electric forklifts as soon as possible.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-21 22:06:03

No Duplicates.

Comment 85 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Paul

Last Name: Rozenberg

Email Address: prozenberg@suburbanpropane.com

Affiliation: Suburban Propane

Subject: Comments on the Proposed Zero-Emission Forklift Regulation

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/91-zeforklifts-VCcHdFc0U3UDd1Ay.pdf'

Original File Name: Suburban Propane - Zero-Emission Forklift Regulation Comments.pdf

Date and Time Comment Was Submitted: 2023-12-22 08:03:22

No Duplicates.

Comment 86 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Manny

Last Name: Leon

Email Address: mleon@rebuildca.org

Affiliation: California Alliance for Jobs

Subject: Zero-Emission Forklift Rule

Comment:

Please see attached letter for CAJ's comments on the Zero-Emission forklift rule.

Attachment: 'www.arb.ca.gov/lists/com-attach/92-zeforklifts-UDNSNVEiU2IFXFMp.pdf'

Original File Name: CARB_ZEV_Forklift_Letter_12_23.pdf

Date and Time Comment Was Submitted: 2023-12-22 09:02:23

No Duplicates.

Comment 87 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: cotb@arb.ca.gov

Last Name: cotb@arb.ca.gov

Email Address: Non-web submitted comment

Affiliation:

Subject: Comment

Comment:

See attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/93-zeforklifts-UihWNVAyVGhQO1c6.pdf'

Original File Name: zecomment.pdf

Date and Time Comment Was Submitted: 2023-12-22 09:22:21

No Duplicates.

Comment 88 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Gary

Last Name: Cross

Email Address: gcross27103@earthlink.net

Affiliation: Industrial Truck Association

Subject: Proposed Zero-Emission Forklift Regulation

Comment:

Please see the attached comments of the Industrial Truck Association

Attachment: 'www.arb.ca.gov/lists/com-attach/94-zeforklifts-AmEGbwZqU21XNAJs.docx'

Original File Name: COMMENTS OF THE INDUSTRIAL TRUCK ASSOCIATIO1.docx

Date and Time Comment Was Submitted: 2023-12-22 09:36:36

No Duplicates.

Comment 89 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Roger

Last Name: Miksad

Email Address: rmiksad@batteryCouncil.org

Affiliation: Battery Council International (BCI)

Subject: BCI Comments on CA Air Resources Board's Proposed Zero Emission Forklift Regulation

Comment:

Good Morning -

Please see the attached comment letter from BCI on the California Air Resources Board's Proposed Zero Emission Forklift Regulation.

Thank you

Attachment: 'www.arb.ca.gov/lists/com-attach/95-zeforklifts-UDIAZQFpU18FYFI9.pdf'

Original File Name: BCI Comments on CARB Forklift Rule 2023.12.21.pdf

Date and Time Comment Was Submitted: 2023-12-22 10:56:31

No Duplicates.

Comment 90 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Tommy

Last Name: Goodwin

Email Address: tommy.goodwin@exhibitionsconferencesalliance.org

Affiliation: Exhibitions & Conferences Alliance

Subject: Exhibitions & Conferences Alliance comments

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/96-zeforklifts-W2kCNAAzVzcKIVRl.pdf'

Original File Name: 2023-12-22 -- ECA CARB ZEFR comments.pdf

Date and Time Comment Was Submitted: 2023-12-22 12:33:30

No Duplicates.

Comment 91 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Jacquelyne
Last Name: Torreyson
Email Address: jackie@bayareapropane.com
Affiliation:

Subject: ZE Forklift Regulation
Comment:

Dear Chair Randolph,

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Jacquelyne Torreyson
5800 Webb St
Riverbank, CA 95367

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 12:41:10

No Duplicates.

Comment 92 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Shannon
Last Name: McWhorter
Email Address: shannon@sequoigas.com
Affiliation:

Subject: ZE Forklift Regulation
Comment:

Dear Chair Randolph,

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Regards,
Shannon McWhorter
2750 Hillside Dr
Fortuna, CA 95540

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 12:42:23

No Duplicates.

Comment 93 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Brendan

Last Name: Gately

Email Address: brendan@bayareapropane.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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Renewable propane drastically reduces GHG emissions without significant financial investment: The propane industry has made extraordinary strides to expand production of low carbon renewable fuels for the transportation sector within California. These strides have been made in part thanks to the work of CARB in its implementation of the Low Carbon Fuel Standard. Renewable propane carbon intensities range from half- to one-quarter of the carbon intensity of California's current electric grid. With current blending and transitions to all-renewable fuels, propane has outpaced carbon emissions for California's electric sector in transportation - particularly off-road forklifts.

I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Brendan Gately
8255 San Leandro St
Oakland, CA 94621

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 12:43:54

No Duplicates.

Comment 94 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Alejandro
Last Name: Rodriguez
Email Address: alexcougar@hotmail.com
Affiliation:

Subject: ZE Forklift Regulation
Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Alejandro Rodriguez
27901 Bunting St
Hayward, CA 94545

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 12:44:55

No Duplicates.

Comment 95 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Allen

Last Name: Earhart

Email Address: tgsgasman@thorntonsgas.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Allen Earhart
4931 Bear River Dr
Rio Oso, CA 95674

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 12:51:06

No Duplicates.

Comment 96 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Brilynn

Last Name: Johnson

Email Address: brilynn.johnson@amerigas.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Brilynn Johnson
508 Butterfield Ct
Lincoln, CA 95648

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 12:52:10

No Duplicates.

Comment 97 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Christine

Last Name: Wolfe

Email Address: christinew@cceb.org

Affiliation: CCEEB

Subject: CCEEB Comments on Draft Zero-Emission Forklift Regulation

Comment:

Please find CCEEB's comments on the Draft Zero-Emission Forklift Regulation attached. Thank you.

Attachment: 'www.arb.ca.gov/lists/com-attach/103-zeforklifts-UGIANldkWDgELAQ1.pdf'

Original File Name: 2023.12.22 CCEEB Comments on 45-Day ZEF Rule.pdf

Date and Time Comment Was Submitted: 2023-12-22 12:59:55

No Duplicates.

Comment 98 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Gary

Last Name: Analian

Email Address: petroilchevron@aol.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Gary Analian
1200 E Mission Blvd
Pomona, CA 91766

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 12:53:48

No Duplicates.

Comment 99 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Mark

Last Name: Wolfe

Email Address: markw@classicdist.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Mark Wolfe
120 Puente Ave
City Of Industry, CA 91746

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 13:08:49

No Duplicates.

Comment 100 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Greg

Last Name: Billington

Email Address: gregb@deltaliquidenergy.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Greg Billington
600 Marylhurst St
Bakersfield, CA 93314

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 13:09:40

No Duplicates.

Comment 101 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Mark

Last Name: Price

Email Address: mprice@campora.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Mark Price
40087 CA-49
Oakhurst, CA 93644

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 13:11:33

No Duplicates.

Comment 102 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Todd

Last Name: Spicer

Email Address: tspicer@campora.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Todd Spicer
2525 E Mariposa Rd
Stockton, CA 95205

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 13:14:41

No Duplicates.

Comment 103 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: James

Last Name: Angulo

Email Address: jangulo@dassels.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

Propane-powered forklifts are the more affordable fuel option: ICE forklift fuel costs decrease substantially when propane fuel costs

are utilized. When propane is used as the fuel of choice for ICE forklifts, ICE forklift fuel costs go down by approximately 55%. Cumulative fuel savings when using propane add up to \$1.87 billion, while cumulative fuel savings when using gasoline amount to \$5.25 billion. Utilizing propane as the main source of fuel for ICE forklifts provides a more accurate depiction of ICE forklift fuel costs as the majority of forklifts are propane-powered. Considering that the fuel savings generated by CARB make up approximately 47% (\$8.2 billion) of CARB's cumulative regulation benefits, transparency on their fuel cost methodology is essential.

Renewable propane drastically reduces GHG emissions without significant financial investment: The propane industry has made extraordinary strides to expand production of low carbon renewable fuels for the transportation sector within California. These strides have been made in part thanks to the work of CARB in its implementation of the Low Carbon Fuel Standard. Renewable propane carbon intensities range from half- to one-quarter of the carbon intensity of California's current electric grid. With current blending and transitions to all-renewable fuels, propane has outpaced carbon emissions for California's electric sector in transportation - particularly off-road forklifts.

I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
James Angulo
31 Wright Rd
Hollister, CA 95023

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 13:15:50

No Duplicates.

Comment 104 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Danny

Last Name: Martinez

Email Address: dmartinez@edplp.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Danny Martinez
6546 Ave 304
Visalia, CA 93291

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 13:17:07

No Duplicates.

Comment 105 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Merle

Last Name: Edington

Email Address: medington@edplp.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Merle Edington
638 E Gage Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 13:18:07

No Duplicates.

Comment 106 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Marty

Last Name: Huerta

Email Address: martyh@expopropane.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Marty Huerta
12685 Foothill Blvd
Los Angeles, CA 91342

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 13:19:07

No Duplicates.

Comment 107 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Sean

Last Name: O'Hara

Email Address: seano@expopropane.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Sean O'Hara
1040 Price St
Pomona, CA 91767

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 13:25:12

No Duplicates.

Comment 108 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Chris

Last Name: Everett

Email Address: ceverett@fallbrookpropanegas.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Chris Everett
1561 S Mission Rd
Fallbrook, CA 92028

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 13:26:06

No Duplicates.

Comment 109 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Dennis

Last Name: Runnels

Email Address: dennis@sierrapropane.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Dennis Runnels
250 S West Ave
Merced, CA 95341

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 13:27:39

No Duplicates.

Comment 110 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Michael

Last Name: Hart

Email Address: mikeh@deltaliquidenergy.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Michael Hart
1960 Ramada Dr
Paso Robles, CA 93446

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 13:28:33

No Duplicates.

Comment 111 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Porterville Citrus

Last Name: Inc.

Email Address: ngalusha@portervillecitrus.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Porterville Citrus Inc.
9289 Clemens Rd
Terra Bella, CA 93270

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 13:29:39

No Duplicates.

Comment 112 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Jay
Last Name: Stephens
Email Address: jay@teecoproducts.com
Affiliation:

Subject: ZE Forklift Regulation
Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

Propane-powered forklifts are the more affordable fuel option: ICE forklift fuel costs decrease substantially when propane fuel costs

are utilized. When propane is used as the fuel of choice for ICE forklifts, ICE forklift fuel costs go down by approximately 55%. Cumulative fuel savings when using propane add up to \$1.87 billion, while cumulative fuel savings when using gasoline amount to \$5.25 billion. Utilizing propane as the main source of fuel for ICE forklifts provides a more accurate depiction of ICE forklift fuel costs as the majority of forklifts are propane-powered. Considering that the fuel savings generated by CARB make up approximately 47% (\$8.2 billion) of CARB's cumulative regulation benefits, transparency on their fuel cost methodology is essential.

Renewable propane drastically reduces GHG emissions without significant financial investment: The propane industry has made extraordinary strides to expand production of low carbon renewable fuels for the transportation sector within California. These strides have been made in part thanks to the work of CARB in its implementation of the Low Carbon Fuel Standard. Renewable propane carbon intensities range from half- to one-quarter of the carbon intensity of California's current electric grid. With current blending and transitions to all-renewable fuels, propane has outpaced carbon emissions for California's electric sector in transportation - particularly off-road forklifts.

I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Jay Stephens
7471 Reese Rd
Sacramento, CA 95828

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 13:31:55

No Duplicates.

Comment 113 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Dennis

Last Name: Johnston

Email Address: dennis.bluejay@gmail.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Dennis Johnston
4300 Flintridge Dr
Bakersfield, CA 93306

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 13:32:52

No Duplicates.

Comment 114 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Bailey

Last Name: McQueary

Email Address: bailey.mcqueary@amerigas.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Bailey McQueary
798 Havenwood Dr
Lincoln, CA 95648

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 13:33:50

No Duplicates.

Comment 115 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Ashley

Last Name: Carucci

Email Address: ashley.carucci@amerigas.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Ashley Carucci
3200 Taylor Rd
Loomis, CA 95650

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 13:34:56

No Duplicates.

Comment 116 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Ramon

Last Name: Mejia

Email Address: lift2@currently.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Ramon Mejia
7979 San Fernando Rd
Los Angeles, CA 91352

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 13:36:35

No Duplicates.

Comment 117 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: John

Last Name: Ward

Email Address: oakhurst@campora.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
John Ward
40087 CA-49
Oakhurst, CA 93644

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 13:38:06

No Duplicates.

Comment 118 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Jose

Last Name: Cardenas

Email Address: jcardenas@edplp.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Jose Cardenas
638 E Gage Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 13:39:00

No Duplicates.

Comment 119 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Jerry

Last Name: Behlen

Email Address: jerry@vmpropane.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Jerry Behlen
20504 99 Frontage Rd
Ripon, CA 95366

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 13:39:56

No Duplicates.

Comment 120 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Rocky

Last Name: Arguijo

Email Address: rocky@windmillpropane.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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Renewable propane drastically reduces GHG emissions without significant financial investment: The propane industry has made extraordinary strides to expand production of low carbon renewable fuels for the transportation sector within California. These strides have been made in part thanks to the work of CARB in its implementation of the Low Carbon Fuel Standard. Renewable propane carbon intensities range from half- to one-quarter of the carbon intensity of California's current electric grid. With current blending and transitions to all-renewable fuels, propane has outpaced carbon emissions for California's electric sector in transportation - particularly off-road forklifts.

I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Rocky Arguijo
6546 Ave 304
Visalia, CA 93291

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 13:42:14

No Duplicates.

Comment 121 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: William

Last Name: Bryan

Email Address: bbryan@pjsrebar.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
William Bryan
45500 Fremont Blvd
Fremont, CA 94539

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 13:43:04

No Duplicates.

Comment 122 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Travis

Last Name: Myers

Email Address: tmyers@campora.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Travis Myers
424 N Main St
Angels Camp, CA 95222

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 13:43:54

No Duplicates.

Comment 123 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Jordan

Last Name: Terlouw

Email Address: jterlouw@campora.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Jordan Terlouw
20221 Paoli Ln
Colfax, CA 95713

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 13:44:58

No Duplicates.

Comment 124 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Michael
Last Name: Glasky
Email Address: mikeg@pjsrebar.com
Affiliation:

Subject: ZE Forklift Regulation
Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

Propane-powered forklifts are the more affordable fuel option: ICE forklift fuel costs decrease substantially when propane fuel costs

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Michael Glasky
2770 Hidden Ln
Hayward, CA 94541

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 13:46:01

No Duplicates.

Comment 125 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Ben

Last Name: De Boer

Email Address: bdeboer@campora.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Ben De Boer
6151 Pony Express Trail
Pollock Pines, CA 95726

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 13:46:51

No Duplicates.

Comment 126 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Anfy

Last Name: Fellman

Email Address: afellman@edplp.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Andy Fellman
19330 Industrial Dr
Sonora, CA 95370

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 13:47:53

No Duplicates.

Comment 127 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Jesus

Last Name: Esparza

Email Address: jesus@cabinet-solutions.us

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Jesus Esparza
897 Rosewood Ave
Vallejo, CA 94591

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 13:48:48

No Duplicates.

Comment 128 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Danny

Last Name: Justice

Email Address: djustice@campora.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Denny Justice
5562 Westside Rd
Redding, CA 96001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 13:49:56

No Duplicates.

Comment 129 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Michael

Last Name: Bauer

Email Address: mbauer@pjsrebar.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

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Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

Propane-powered forklifts are the more affordable fuel option: ICE forklift fuel costs decrease substantially when propane fuel costs

are utilized. When propane is used as the fuel of choice for ICE forklifts, ICE forklift fuel costs go down by approximately 55%. Cumulative fuel savings when using propane add up to \$1.87 billion, while cumulative fuel savings when using gasoline amount to \$5.25 billion. Utilizing propane as the main source of fuel for ICE forklifts provides a more accurate depiction of ICE forklift fuel costs as the majority of forklifts are propane-powered. Considering that the fuel savings generated by CARB make up approximately 47% (\$8.2 billion) of CARB's cumulative regulation benefits, transparency on their fuel cost methodology is essential.

Renewable propane drastically reduces GHG emissions without significant financial investment: The propane industry has made extraordinary strides to expand production of low carbon renewable fuels for the transportation sector within California. These strides have been made in part thanks to the work of CARB in its implementation of the Low Carbon Fuel Standard. Renewable propane carbon intensities range from half- to one-quarter of the carbon intensity of California's current electric grid. With current blending and transitions to all-renewable fuels, propane has outpaced carbon emissions for California's electric sector in transportation - particularly off-road forklifts.

I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Michael Bauer
13600 Uvas Rd
Morgan Hill, CA 95037

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 13:50:37

No Duplicates.

Comment 130 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Pat

Last Name: Temples

Email Address: ptemples@edplp.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Pat Temples
19330 Industrial Dr
Sonora, CA 95370

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 13:51:35

No Duplicates.

Comment 131 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Mike

Last Name: MacLaren

Email Address: mmaclaren@campora.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Mike MacLaren
1766 Main Street
Weaverville, CA 96093

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 13:52:24

No Duplicates.

Comment 132 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Jordan

Last Name: Leib

Email Address: jordan@growcold.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Jordan Leib
2050 Galvez Ave
San Francisco, CA 94124

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 13:53:22

No Duplicates.

Comment 133 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Todd

Last Name: Wright

Email Address: twright@campora.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Todd Wright
41865 CA-299
Willow Creek, CA 95573

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 13:54:16

No Duplicates.

Comment 134 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Fred

Last Name: Ayala

Email Address: cavalier1984@yahoo.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Fred Ayala
8049 Langdon Ave
Hesperia, CA 92345

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 13:56:28

No Duplicates.

Comment 135 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Adina

Last Name: Chapman

Email Address: adinachapman315@gmail.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Adina Chapman
8300 San Marcos Rd
Atascadero, CA 93422

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 13:57:21

No Duplicates.

Comment 136 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Wendy

Last Name: Britto

Email Address: wendy.britto@greentechrenewables.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Wendy Britto
31260 Wiegman Rd
Hayward, CA 94544

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 13:59:15

No Duplicates.

Comment 137 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Peifang

Last Name: Chang

Email Address: castalyesther@gmail.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Peifang Chang
637 Vineland Ave
La Puente, CA 91746

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 14:00:15

No Duplicates.

Comment 138 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: James

Last Name: Yundt

Email Address: jdy@roofmaster.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

Propane-powered forklifts are the more affordable fuel option: ICE forklift fuel costs decrease substantially when propane fuel costs

are utilized. When propane is used as the fuel of choice for ICE forklifts, ICE forklift fuel costs go down by approximately 55%. Cumulative fuel savings when using propane add up to \$1.87 billion, while cumulative fuel savings when using gasoline amount to \$5.25 billion. Utilizing propane as the main source of fuel for ICE forklifts provides a more accurate depiction of ICE forklift fuel costs as the majority of forklifts are propane-powered. Considering that the fuel savings generated by CARB make up approximately 47% (\$8.2 billion) of CARB's cumulative regulation benefits, transparency on their fuel cost methodology is essential.

Renewable propane drastically reduces GHG emissions without significant financial investment: The propane industry has made extraordinary strides to expand production of low carbon renewable fuels for the transportation sector within California. These strides have been made in part thanks to the work of CARB in its implementation of the Low Carbon Fuel Standard. Renewable propane carbon intensities range from half- to one-quarter of the carbon intensity of California's current electric grid. With current blending and transitions to all-renewable fuels, propane has outpaced carbon emissions for California's electric sector in transportation - particularly off-road forklifts.

I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
James Yundt
750 Monterey Pass Rd
Monterey Park, CA 91754

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 14:01:46

No Duplicates.

Comment 139 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Paula

Last Name: Laney

Email Address: planey@edplp.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Paula Laney
638 E Gage Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 14:02:49

No Duplicates.

Comment 140 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Scott

Last Name: Graham

Email Address: sgraham@edplp.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Scott Graham
638 E Gage Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 14:03:41

No Duplicates.

Comment 141 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Travis

Last Name: Dunham

Email Address: tdunham@edplp.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Travis Dunham
638 E Gage Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 14:04:39

No Duplicates.

Comment 142 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Laura

Last Name: Hawkinson

Email Address: lhawkinson@edplp.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Laura Hawkinson
638 E Gage Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 14:05:25

No Duplicates.

Comment 143 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: David

Last Name: Stroupe

Email Address: dstroupe@edplp.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
David Stroupe
638 E Gage Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 14:06:11

No Duplicates.

Comment 144 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Daniel

Last Name: Dixon

Email Address: ddixon@edplp.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Daniel Dixon
638 E Gage Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 14:07:04

No Duplicates.

Comment 145 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Gena

Last Name: Vasbinder

Email Address: gvasbinder@edplp.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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Regards,
Gena Vasbinder
638 E Gage Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 14:08:10

No Duplicates.

Comment 146 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Brenda

Last Name: Griffe

Email Address: bgriffe@edplp.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Brenda Griffe
2525 E Mariposa Rd
Stockton, CA 95205

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 14:09:01

No Duplicates.

Comment 147 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Cathy

Last Name: Adams

Email Address: cadams@edplp.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

Propane-powered forklifts are the more affordable fuel option: ICE forklift fuel costs decrease substantially when propane fuel costs

are utilized. When propane is used as the fuel of choice for ICE forklifts, ICE forklift fuel costs go down by approximately 55%. Cumulative fuel savings when using propane add up to \$1.87 billion, while cumulative fuel savings when using gasoline amount to \$5.25 billion. Utilizing propane as the main source of fuel for ICE forklifts provides a more accurate depiction of ICE forklift fuel costs as the majority of forklifts are propane-powered. Considering that the fuel savings generated by CARB make up approximately 47% (\$8.2 billion) of CARB's cumulative regulation benefits, transparency on their fuel cost methodology is essential.

Renewable propane drastically reduces GHG emissions without significant financial investment: The propane industry has made extraordinary strides to expand production of low carbon renewable fuels for the transportation sector within California. These strides have been made in part thanks to the work of CARB in its implementation of the Low Carbon Fuel Standard. Renewable propane carbon intensities range from half- to one-quarter of the carbon intensity of California's current electric grid. With current blending and transitions to all-renewable fuels, propane has outpaced carbon emissions for California's electric sector in transportation - particularly off-road forklifts.

I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Cathy Adams
20504 99 Frontage Rd
Ripon, CA 95366

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 14:09:52

No Duplicates.

Comment 148 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Chris

Last Name: Daly

Email Address: cdaly@edplp.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Chris Daly
638 E Gage Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 14:10:42

No Duplicates.

Comment 149 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Grant

Last Name: Culpan

Email Address: grant@maucksheetmetal.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Grant Culpan
755 Independent Rd
Oakland, CA 94621

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 14:11:43

No Duplicates.

Comment 150 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Boyd
Last Name: McGathey
Email Address: boyd@edplp.net
Affiliation:

Subject: ZE Forklift Regulation
Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Boyd McGathey
638 E Gage Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 14:12:35

No Duplicates.

Comment 151 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Tom
Last Name: Knauff
Email Address: tknauff@edplp.net
Affiliation:

Subject: ZE Forklift Regulation
Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Tom Knauff
638 E Gage Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 14:15:22

No Duplicates.

Comment 152 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Enrique

Last Name: Silva

Email Address: enriques@expopropane.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Enrique Silva
638 E Gage Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 14:16:10

No Duplicates.

Comment 153 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Jorge

Last Name: Rivas

Email Address: jorger@expopropane.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Jorge Rivas
638 E Gage Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 14:17:01

No Duplicates.

Comment 154 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Veronica

Last Name: Silva

Email Address: veronica@expopropane.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Veronica Silva
638 E Gage Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 14:17:49

No Duplicates.

Comment 155 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Fernando

Last Name: Gallegos

Email Address: fernando.gallegos@emerson.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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Propane-powered forklifts are the more affordable fuel option: ICE forklift fuel costs decrease substantially when propane fuel costs

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Renewable propane drastically reduces GHG emissions without significant financial investment: The propane industry has made extraordinary strides to expand production of low carbon renewable fuels for the transportation sector within California. These strides have been made in part thanks to the work of CARB in its implementation of the Low Carbon Fuel Standard. Renewable propane carbon intensities range from half- to one-quarter of the carbon intensity of California's current electric grid. With current blending and transitions to all-renewable fuels, propane has outpaced carbon emissions for California's electric sector in transportation - particularly off-road forklifts.

I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Fernando Gallegos
3200 Emerson Way
Mckinney, TX 75069

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 14:19:11

No Duplicates.

Comment 156 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Michael

Last Name: Yates

Email Address: mikeyates@highhillventures.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Michael Yates
22292 Regnart Rd
Cupertino, CA 95014

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 14:20:03

No Duplicates.

Comment 157 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Restaurant Van

Last Name: Inc.

Email Address: accountant@cookercooler.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Restaurant Van Inc.
1584 Zephyr Ave
Hayward, CA 94544

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 14:20:51

No Duplicates.

Comment 158 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Steve

Last Name: Glovsky

Email Address: steve@sierrapropane.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Steve Glovsky
250 S West Ave
Merced, CA 95341

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 14:25:41

No Duplicates.

Comment 159 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Ryan

Last Name: Van Duyn

Email Address: ryan@vmpropane.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Ryan Van Duyn
20504 99 Frontage Rd
Ripon, CA 95366

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 14:26:40

No Duplicates.

Comment 160 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Pierluigi
Last Name: Giannini
Email Address: pgiannini@gmail.com
Affiliation:

Subject: ZE Forklift Regulation
Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Pierluigi Giannini
656 Telford Ave
South San Francisco, CA 94080

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 14:27:51

No Duplicates.

Comment 161 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Kammui

Last Name: Ng

Email Address: pandacarpetusa@gmail.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Kammui Ng
2958 Giovana Way
Castro Valley, CA 94546

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 14:28:54

No Duplicates.

Comment 162 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Cassandra

Last Name: Bae

Email Address: cassandrabae82@gmail.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Cassandra Bae
3967 E St
Sacramento, CA 95819

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 14:29:51

No Duplicates.

Comment 163 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: David

Last Name: Vance

Email Address: david.vance@amerigas.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
David Vance
PO Box 90952
San Bernardino, CA 92427

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 14:31:39

No Duplicates.

Comment 164 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Christina

Last Name: Glasgow

Email Address: christina.glasgow@amerigas.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

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Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

Propane-powered forklifts are the more affordable fuel option: ICE forklift fuel costs decrease substantially when propane fuel costs

are utilized. When propane is used as the fuel of choice for ICE forklifts, ICE forklift fuel costs go down by approximately 55%. Cumulative fuel savings when using propane add up to \$1.87 billion, while cumulative fuel savings when using gasoline amount to \$5.25 billion. Utilizing propane as the main source of fuel for ICE forklifts provides a more accurate depiction of ICE forklift fuel costs as the majority of forklifts are propane-powered. Considering that the fuel savings generated by CARB make up approximately 47% (\$8.2 billion) of CARB's cumulative regulation benefits, transparency on their fuel cost methodology is essential.

Renewable propane drastically reduces GHG emissions without significant financial investment: The propane industry has made extraordinary strides to expand production of low carbon renewable fuels for the transportation sector within California. These strides have been made in part thanks to the work of CARB in its implementation of the Low Carbon Fuel Standard. Renewable propane carbon intensities range from half- to one-quarter of the carbon intensity of California's current electric grid. With current blending and transitions to all-renewable fuels, propane has outpaced carbon emissions for California's electric sector in transportation - particularly off-road forklifts.

I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Christina Glasgow
65 Arizona St
Bishop, CA 93514

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 14:32:29

No Duplicates.

Comment 165 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Michelle

Last Name: Mossman

Email Address: michelle.mossman@amerigas.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Michelle Mossman
49499 Pierce Dr
Oakhurst, CA 93644

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 14:33:18

No Duplicates.

Comment 166 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Rebecca

Last Name: Hernandez

Email Address: rebecca.hernandez@amerigas.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Rebecca Hernandez
8480 Specialty Cir
Sacramento, CA 95828

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 14:34:04

No Duplicates.

Comment 167 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: David

Last Name: Jones

Email Address: dave.jones@amerigas.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
David Jones
30882 Anderson Cir
Menifee, CA 92584

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 14:34:54

No Duplicates.

Comment 168 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: William

Last Name: Wilt

Email Address: william.wilt@amerigas.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
William Wilt
2080 S Golden State Blvd
Fowler, CA 93625

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 14:35:46

No Duplicates.

Comment 169 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Aaron

Last Name: Nelson

Email Address: aaron@bayareadieseldelivery.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Aaron Nelson
4070 Castlewood Ct
Concord, CA 94518

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 14:36:46

No Duplicates.

Comment 170 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: John

Last Name: Nadolski

Email Address: dandjecho@gmail.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
John Nadolski
4921 N Brightview Dr
Covina, CA 91722

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 14:37:50

No Duplicates.

Comment 171 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Dalila

Last Name: Parra

Email Address: dalila.parra@amerigas.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Dalila Parra
126 Farland Pl
Escondido, CA 92027

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 14:39:13

No Duplicates.

Comment 172 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Nicolas

Last Name: Rivera

Email Address: nrivera@advantagers.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Nicolas Rivera
3201 Liberty Square Pkwy
Turlock, CA 95380

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 14:40:24

No Duplicates.

Comment 173 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Koury

Last Name: Ensley

Email Address: kensley0126@yahoo.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

Propane-powered forklifts are the more affordable fuel option: ICE forklift fuel costs decrease substantially when propane fuel costs

are utilized. When propane is used as the fuel of choice for ICE forklifts, ICE forklift fuel costs go down by approximately 55%. Cumulative fuel savings when using propane add up to \$1.87 billion, while cumulative fuel savings when using gasoline amount to \$5.25 billion. Utilizing propane as the main source of fuel for ICE forklifts provides a more accurate depiction of ICE forklift fuel costs as the majority of forklifts are propane-powered. Considering that the fuel savings generated by CARB make up approximately 47% (\$8.2 billion) of CARB's cumulative regulation benefits, transparency on their fuel cost methodology is essential.

Renewable propane drastically reduces GHG emissions without significant financial investment: The propane industry has made extraordinary strides to expand production of low carbon renewable fuels for the transportation sector within California. These strides have been made in part thanks to the work of CARB in its implementation of the Low Carbon Fuel Standard. Renewable propane carbon intensities range from half- to one-quarter of the carbon intensity of California's current electric grid. With current blending and transitions to all-renewable fuels, propane has outpaced carbon emissions for California's electric sector in transportation - particularly off-road forklifts.

I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Koury Ensley
16874 Century St
Moreno Valley, CA 92551

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 14:41:25

No Duplicates.

Comment 174 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Alex

Last Name: Wu

Email Address: alexwu@superlinkusa.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Alex Wu
888 92nd Ave
Oakland, CA 94603

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 14:42:18

No Duplicates.

Comment 175 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Daniel

Last Name: Budd

Email Address: dan.budd@amerigas.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Daniel Budd
8316 52nd St Ct W
Tacoma, WA 98467

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 14:43:39

No Duplicates.

Comment 176 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Thomas

Last Name: Daniels

Email Address: tom@aeenergy.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Thomas Daniels
103 Via Robles
Paso Robles, CA 93446

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 14:44:34

No Duplicates.

Comment 177 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Alison
Last Name: Hahm
Email Address: ahahm@nrdc.org
Affiliation: THE Impact Project

Subject: Comments on Proposed Zero-Emission Forklifts Regulation
Comment:

Dear Mr. Roderick and Mr. Chen,

Please find attached a comment letter on the proposed Zero-Emission Forklifts regulation, submitted on behalf of the following organizations:

Center for Community Action and Environmental Justice
Coalition for Clean Air
Earthjustice
East Yard Communities for Environmental Justice
Natural Resources Defense Council
Pacific Environment
San Pedro & Peninsula Homeowners Coalition
Sierra Club
West Long Beach Association

Thank you for your consideration and please let us know if you have any questions.

Sincerely,
Alison

Attachment: 'www.arb.ca.gov/lists/com-attach/183-zeforklifts-VWdcaQMsAmABNQcp.pdf'

Original File Name: 23.12.22 Impact Project Coalition_ZE Forklifts Comments_final.pdf

Date and Time Comment Was Submitted: 2023-12-22 18:40:10

No Duplicates.

Comment 178 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: John
Last Name: Casper
Email Address: jcasper@edplp.net
Affiliation:

Subject: ZE Forklift Regulation
Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
John Casper
638 E Gage Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 20:11:20

No Duplicates.

Comment 179 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Kathy

Last Name: Johnson

Email Address: kjohnson@edplp.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Kathy Johnson
638 E Gage Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 20:13:03

No Duplicates.

Comment 180 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Jim

Last Name: Rushing

Email Address: jrushing@edplp.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Jim Rushing
638 E Gage Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 20:14:05

No Duplicates.

Comment 181 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Russ

Last Name: Head

Email Address: rhead@edplp.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

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Regards,
Russ Head
638 E Gage Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 20:15:28

No Duplicates.

Comment 182 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Josh

Last Name: Perceful

Email Address: jperceful@edplp.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

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Propane-powered forklifts are the more affordable fuel option: ICE forklift fuel costs decrease substantially when propane fuel costs

are utilized. When propane is used as the fuel of choice for ICE forklifts, ICE forklift fuel costs go down by approximately 55%. Cumulative fuel savings when using propane add up to \$1.87 billion, while cumulative fuel savings when using gasoline amount to \$5.25 billion. Utilizing propane as the main source of fuel for ICE forklifts provides a more accurate depiction of ICE forklift fuel costs as the majority of forklifts are propane-powered. Considering that the fuel savings generated by CARB make up approximately 47% (\$8.2 billion) of CARB's cumulative regulation benefits, transparency on their fuel cost methodology is essential.

Renewable propane drastically reduces GHG emissions without significant financial investment: The propane industry has made extraordinary strides to expand production of low carbon renewable fuels for the transportation sector within California. These strides have been made in part thanks to the work of CARB in its implementation of the Low Carbon Fuel Standard. Renewable propane carbon intensities range from half- to one-quarter of the carbon intensity of California's current electric grid. With current blending and transitions to all-renewable fuels, propane has outpaced carbon emissions for California's electric sector in transportation - particularly off-road forklifts.

I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Josh Perceful
638 E Gage Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 20:20:13

No Duplicates.

Comment 183 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Teri

Last Name: Larson

Email Address: tlarson@edplp.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Teri Larson
638 E Gage Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 20:27:39

No Duplicates.

Comment 184 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Casandra

Last Name: Russo

Email Address: casandra.russo@amerigas.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Casandra Russo
1288 Cimmeron Way
Lincoln, CA 95648

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 20:28:18

No Duplicates.

Comment 185 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Jim

Last Name: Jones

Email Address: jim@topsidemarine.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Jim Jones
900 Golden Wheel Park Dr
San Jose, CA 95112

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 20:30:26

No Duplicates.

Comment 186 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Mike

Last Name: Senoski

Email Address: msenoski@edplp.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Mike Senoski
638 E Gage Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 20:33:14

No Duplicates.

Comment 187 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Eric

Last Name: McNeily

Email Address: emcneily@edplp.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Eric McNeily
638 E Gage Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 20:34:26

No Duplicates.

Comment 188 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Chase

Last Name: Frederick

Email Address: cfrederick@edplp.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Chase Frederick
638 E Gage Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 20:35:17

No Duplicates.

Comment 189 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Kris

Last Name: Osika

Email Address: kosika@edplp.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Kris Osika
638 E Gage Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 20:36:17

No Duplicates.

Comment 190 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Alan

Last Name: Copenhaver

Email Address: acopenhaver@edplp.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Alan Copenhaver
638 E Gage Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 20:37:11

No Duplicates.

Comment 191 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Don

Last Name: Wilk

Email Address: dwilk@edplp.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

Propane-powered forklifts are the more affordable fuel option: ICE forklift fuel costs decrease substantially when propane fuel costs

are utilized. When propane is used as the fuel of choice for ICE forklifts, ICE forklift fuel costs go down by approximately 55%. Cumulative fuel savings when using propane add up to \$1.87 billion, while cumulative fuel savings when using gasoline amount to \$5.25 billion. Utilizing propane as the main source of fuel for ICE forklifts provides a more accurate depiction of ICE forklift fuel costs as the majority of forklifts are propane-powered. Considering that the fuel savings generated by CARB make up approximately 47% (\$8.2 billion) of CARB's cumulative regulation benefits, transparency on their fuel cost methodology is essential.

Renewable propane drastically reduces GHG emissions without significant financial investment: The propane industry has made extraordinary strides to expand production of low carbon renewable fuels for the transportation sector within California. These strides have been made in part thanks to the work of CARB in its implementation of the Low Carbon Fuel Standard. Renewable propane carbon intensities range from half- to one-quarter of the carbon intensity of California's current electric grid. With current blending and transitions to all-renewable fuels, propane has outpaced carbon emissions for California's electric sector in transportation - particularly off-road forklifts.

I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Don Wilk
638 E Gage Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 20:38:07

No Duplicates.

Comment 192 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Fahad
Last Name: Telchi
Email Address: ftelchi@edplp.net
Affiliation:

Subject: ZE Forklift Regulation
Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Fahad Telchi
638 E Gage Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 20:38:56

No Duplicates.

Comment 193 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Kenya

Last Name: Alexander

Email Address: kalexander@edplp.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Kenya Alexander
638 E Gage Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 20:39:43

No Duplicates.

Comment 194 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Tanvir
Last Name: Siddiqui
Email Address: tsiddiqui@edplp.net
Affiliation:

Subject: ZE Forklift Regulation
Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Tanvir Siddiqui
638 E Gage Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 20:41:08

No Duplicates.

Comment 195 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Josh

Last Name: Gibson

Email Address: jgibson@edplp.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Josh Gibson
638 E Gage Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 20:41:45

No Duplicates.

Comment 196 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Brenda

Last Name: Hernandez

Email Address: bhernandez@edplp.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Brenda Hernandez
638 E Gage Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 20:42:43

No Duplicates.

Comment 197 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Lynn

Last Name: Curto

Email Address: lcurto@edplp.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Lynn Curto
638 E Gage Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 20:43:54

No Duplicates.

Comment 198 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Jennifer

Last Name: Rivas

Email Address: jrivas@edplp.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Jennifer Rivas
638 E Gage Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 20:44:58

No Duplicates.

Comment 199 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Gail

Last Name: Lambert

Email Address: glambert@edplp.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Gail Lambert
638 E Gage Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 20:45:46

No Duplicates.

Comment 200 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Mary

Last Name: Brown

Email Address: mbrown@edplp.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

Propane-powered forklifts are the more affordable fuel option: ICE forklift fuel costs decrease substantially when propane fuel costs

are utilized. When propane is used as the fuel of choice for ICE forklifts, ICE forklift fuel costs go down by approximately 55%. Cumulative fuel savings when using propane add up to \$1.87 billion, while cumulative fuel savings when using gasoline amount to \$5.25 billion. Utilizing propane as the main source of fuel for ICE forklifts provides a more accurate depiction of ICE forklift fuel costs as the majority of forklifts are propane-powered. Considering that the fuel savings generated by CARB make up approximately 47% (\$8.2 billion) of CARB's cumulative regulation benefits, transparency on their fuel cost methodology is essential.

Renewable propane drastically reduces GHG emissions without significant financial investment: The propane industry has made extraordinary strides to expand production of low carbon renewable fuels for the transportation sector within California. These strides have been made in part thanks to the work of CARB in its implementation of the Low Carbon Fuel Standard. Renewable propane carbon intensities range from half- to one-quarter of the carbon intensity of California's current electric grid. With current blending and transitions to all-renewable fuels, propane has outpaced carbon emissions for California's electric sector in transportation - particularly off-road forklifts.

I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Mary Brown
638 E Gage Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 20:46:28

No Duplicates.

Comment 201 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Mary

Last Name: Seklecki

Email Address: mseklecki@edplp.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Mary Seklecki
638 E Gage Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 20:47:15

No Duplicates.

Comment 202 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Desiree

Last Name: Aranda

Email Address: daranda@edplp.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Desiree Aranda
638 E Gage Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 20:48:19

No Duplicates.

Comment 203 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Marisa

Last Name: Robertson

Email Address: mrobertson@edplp.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Marisa Robertson
638 E Gage Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 20:49:11

No Duplicates.

Comment 204 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Atearia

Last Name: Caldwell

Email Address: acaldwell@edplp.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Atearia Caldwell
638 E Gage Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 20:49:59

No Duplicates.

Comment 205 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Dennis

Last Name: Cayaba

Email Address: dcayaba@edplp.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Dennis Cayaba
638 E Gage Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 20:51:11

No Duplicates.

Comment 206 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Anthony

Last Name: Jagers

Email Address: ajagers@edlp.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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Regards,
Anthony Jagers
638 E Gage Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 20:51:59

No Duplicates.

Comment 207 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Andrew

Last Name: Fahrenbach

Email Address: afahrenback@edlp.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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Regards,
Andrew Fahrenbach
638 E Gage Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 20:52:48

No Duplicates.

Comment 208 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Jeremy

Last Name: Bidwell

Email Address: jbidwell@edplp.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

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Propane-powered forklifts are the more affordable fuel option: ICE forklift fuel costs decrease substantially when propane fuel costs

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Renewable propane drastically reduces GHG emissions without significant financial investment: The propane industry has made extraordinary strides to expand production of low carbon renewable fuels for the transportation sector within California. These strides have been made in part thanks to the work of CARB in its implementation of the Low Carbon Fuel Standard. Renewable propane carbon intensities range from half- to one-quarter of the carbon intensity of California's current electric grid. With current blending and transitions to all-renewable fuels, propane has outpaced carbon emissions for California's electric sector in transportation - particularly off-road forklifts.

I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Jeremy Bidwell
1484 Pinon Ave
CA 95341

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 20:53:47

No Duplicates.

Comment 209 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Diana

Last Name: Dominguez

Email Address: baytechins@gmail.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Diana Dominguez
1515 Day Ave
San Mateo, CA 94403

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 20:57:14

No Duplicates.

Comment 210 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Dario

Last Name: Dominguez

Email Address: darioriosness@gmail.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Dario Dominguez
1515 Day Ave
San Mateo, CA 94403

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 20:58:20

No Duplicates.

Comment 211 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Rajiv

Last Name: Jain

Email Address: rjain@btw1.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Rajiv Jain
29523 Holyoke Ave
Hayward, CA 94544

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 20:59:28

No Duplicates.

Comment 212 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Stephen

Last Name: Evans

Email Address: swenceslae@hotmail.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Stephen Evans
1110 Golden Way
Los Altos, CA 94024

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 21:00:26

No Duplicates.

Comment 213 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Jeff

Last Name: Silversmith

Email Address: jsilversmith@ksplastic.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Jeff Silversmith
2116 Farallon Dr
San Leandro, CA 94577

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 21:01:20

No Duplicates.

Comment 214 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Kevin

Last Name: Ahern

Email Address: kahern@ksplastic.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Kevin Ahern
2116 Farallon Dr
San Leandro, CA 94577

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 21:02:19

No Duplicates.

Comment 215 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Eric

Last Name: McAlister

Email Address: emcalister@jswest.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Eric McAlister
501 9th St
Modesto, CA 95354

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 21:03:08

No Duplicates.

Comment 216 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: David

Last Name: Spinney

Email Address: dave@allstatepropane.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
David Spinney
21520 Yorba Linda Blvd
Yorba Linda, CA 92887

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 21:03:56

No Duplicates.

Comment 217 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Paul

Last Name: Dinsdale

Email Address: pdinsdale@wrmeadows.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

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Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

Propane-powered forklifts are the more affordable fuel option: ICE forklift fuel costs decrease substantially when propane fuel costs

are utilized. When propane is used as the fuel of choice for ICE forklifts, ICE forklift fuel costs go down by approximately 55%. Cumulative fuel savings when using propane add up to \$1.87 billion, while cumulative fuel savings when using gasoline amount to \$5.25 billion. Utilizing propane as the main source of fuel for ICE forklifts provides a more accurate depiction of ICE forklift fuel costs as the majority of forklifts are propane-powered. Considering that the fuel savings generated by CARB make up approximately 47% (\$8.2 billion) of CARB's cumulative regulation benefits, transparency on their fuel cost methodology is essential.

Renewable propane drastically reduces GHG emissions without significant financial investment: The propane industry has made extraordinary strides to expand production of low carbon renewable fuels for the transportation sector within California. These strides have been made in part thanks to the work of CARB in its implementation of the Low Carbon Fuel Standard. Renewable propane carbon intensities range from half- to one-quarter of the carbon intensity of California's current electric grid. With current blending and transitions to all-renewable fuels, propane has outpaced carbon emissions for California's electric sector in transportation - particularly off-road forklifts.

I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Paul Dinsdale
652 Indiana St
Benicia, CA 94510

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 21:05:13

No Duplicates.

Comment 218 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Melissa

Last Name: Newland

Email Address: melissa.newland@amerigas.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Melissa Newland
985 Sun City Ln Ste 109
Lincoln, CA 95648

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 21:06:17

No Duplicates.

Comment 219 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Anthony

Last Name: Pedotto

Email Address: pedotto@rocketmail.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Anthony Pedotto
27623 Jefferson Ave
Temecula, CA 92590

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 21:07:15

No Duplicates.

Comment 220 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Michael
Last Name: Woodside
Email Address: woody@westernpropane.com
Affiliation:

Subject: ZE Forklift Regulation
Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Michael Woodside
1044 Cinnabar Ct
Santa Maria, CA 93455

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 21:08:23

No Duplicates.

Comment 221 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Flavio

Last Name: Arce

Email Address: sunlitemetals@yahoo.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Flavio Arce
2210 E 85th St
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 21:09:15

No Duplicates.

Comment 222 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Larissa

Last Name: Crittenden

Email Address: larissa.crittenden@amerigas.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Larissa Crittenden
1345 Incline Dr
Lincoln, CA 95648

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 21:10:16

No Duplicates.

Comment 223 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Patrick

Last Name: Harvey

Email Address: pharvey.fsl@sbcglobal.net

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Patrick Harvey
6899 Smith Ave
Newark, CA 94560

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 21:13:04

No Duplicates.

Comment 224 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Cody

Last Name: Krakowski

Email Address: codysilva172@gmail.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Cody Krakowski
PO Box 335
Point Arena, CA 95468

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 21:14:06

No Duplicates.

Comment 225 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Steve

Last Name: Moore

Email Address: stevemooorepropane@outlook.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Steve Moore
32565b Golden Lantern
Dana Point, CA 92629

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 21:15:10

No Duplicates.

Comment 226 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Justin

Last Name: Tran

Email Address: justintran82@yahoo.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

Propane-powered forklifts are the more affordable fuel option: ICE forklift fuel costs decrease substantially when propane fuel costs

are utilized. When propane is used as the fuel of choice for ICE forklifts, ICE forklift fuel costs go down by approximately 55%. Cumulative fuel savings when using propane add up to \$1.87 billion, while cumulative fuel savings when using gasoline amount to \$5.25 billion. Utilizing propane as the main source of fuel for ICE forklifts provides a more accurate depiction of ICE forklift fuel costs as the majority of forklifts are propane-powered. Considering that the fuel savings generated by CARB make up approximately 47% (\$8.2 billion) of CARB's cumulative regulation benefits, transparency on their fuel cost methodology is essential.

Renewable propane drastically reduces GHG emissions without significant financial investment: The propane industry has made extraordinary strides to expand production of low carbon renewable fuels for the transportation sector within California. These strides have been made in part thanks to the work of CARB in its implementation of the Low Carbon Fuel Standard. Renewable propane carbon intensities range from half- to one-quarter of the carbon intensity of California's current electric grid. With current blending and transitions to all-renewable fuels, propane has outpaced carbon emissions for California's electric sector in transportation - particularly off-road forklifts.

I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Justin Tran
114 Adeline St
Oakland, CA 94607

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 21:16:29

No Duplicates.

Comment 227 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Dr.

Last Name: Wong

Email Address: docwong@mac.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Dr Wong
6 Quail Ct
Woodside, CA 94062

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 21:17:14

No Duplicates.

Comment 228 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Mark

Last Name: Leitman

Email Address: mark.leitman@icloud.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Mark Leitman
5980 Vista Ridge
Santa Rosa, CA 95409

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 21:18:03

No Duplicates.

Comment 229 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: David

Last Name: Murphy

Email Address: david.murphy@amerigas.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
David Murphy
113 Duranta St
Roseville, CA 95678

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 21:19:01

No Duplicates.

Comment 230 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Felipe

Last Name: Gutierrez

Email Address: abm90502@gmail.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Felipe Gutierrez
23116 Normandie Ave
Torrance, CA 90502

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 21:19:57

No Duplicates.

Comment 231 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Yamel
Last Name: Monjaraz
Email Address: lemay72@aol.com
Affiliation:

Subject: ZE Forklift Regulation
Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Yamel Monjaraz
555 E Tennis Ct Ln
San Bernardino, CA 92408

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 21:20:43

No Duplicates.

Comment 232 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Armando

Last Name: Silva

Email Address: aa@armandoaluminum.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Armando Silva
1761 Massachusetts Ave
Riverside, CA 92507

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 21:21:32

No Duplicates.

Comment 233 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Alex

Last Name: Loyola

Email Address: gm@apexpalletsinc.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Alex Loyola
1006 S East End Ave
Pomona, CA 91766

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 21:22:41

No Duplicates.

Comment 234 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: William

Last Name: Hayes

Email Address: william@westernstatesroofing.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
William Hayes
18605 Parthenia St
Los Angeles, CA 91324

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 21:23:34

No Duplicates.

Comment 235 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Sabrina

Last Name: Garcia

Email Address: sabrina@westernstatesroofing.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

Propane-powered forklifts are the more affordable fuel option: ICE forklift fuel costs decrease substantially when propane fuel costs

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Sabrina Garcia
18605 Parthenia St
Los Angeles, CA 91324

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 21:24:26

No Duplicates.

Comment 236 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Samuel

Last Name: Wagya

Email Address: p27global@gmail.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Samuel Wagya
4900 E Washington Blvd
Commerce, CA 90040

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 21:25:13

No Duplicates.

Comment 237 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Eric

Last Name: Van Der Heyden

Email Address: eric@royalcabinets.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Eric Van Der Heyden
1299 East Phillips Blvd
CA 91763

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 21:26:05

No Duplicates.

Comment 238 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Maria

Last Name: Vargas

Email Address: maria@anyabrothers.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

Propane-powered forklifts are the more affordable fuel option: ICE forklift fuel costs decrease substantially when propane fuel costs

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Maria Vargas
3130 Leonis Blvd
Vernon, CA 90058

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 21:27:42

No Duplicates.

Comment 239 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Chris

Last Name: Roy

Email Address: ocfarmsupply@gmail.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Chris Roy
1826 W Chapman Ave
Orange, CA 92868

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 21:28:24

No Duplicates.

Comment 240 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Steve

Last Name: Wright

Email Address: stevewnjb@aol.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Steve Wright
8422 Standustrial St
Stanton, CA 90680

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 21:29:04

No Duplicates.

Comment 241 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Yvette

Last Name: Garcia

Email Address: yvette@deluxebuildingproducts.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Yvette Garcia
12559 Vivienda Ave
Grand Terrace, CA 92313

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 21:32:21

No Duplicates.

Comment 242 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Teri

Last Name: Lucero

Email Address: tlucero@centerlinelogistics.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Teri Lucero
321 A Ave
Alameda, CA 94501

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 21:33:43

No Duplicates.

Comment 243 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Gregory
Last Name: Leighton
Email Address: greg@cgplastics.net
Affiliation:

Subject: ZE Forklift Regulation
Comment:

Dear Chair Randolph,

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Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

Propane-powered forklifts are the more affordable fuel option: ICE forklift fuel costs decrease substantially when propane fuel costs

are utilized. When propane is used as the fuel of choice for ICE forklifts, ICE forklift fuel costs go down by approximately 55%. Cumulative fuel savings when using propane add up to \$1.87 billion, while cumulative fuel savings when using gasoline amount to \$5.25 billion. Utilizing propane as the main source of fuel for ICE forklifts provides a more accurate depiction of ICE forklift fuel costs as the majority of forklifts are propane-powered. Considering that the fuel savings generated by CARB make up approximately 47% (\$8.2 billion) of CARB's cumulative regulation benefits, transparency on their fuel cost methodology is essential.

Renewable propane drastically reduces GHG emissions without significant financial investment: The propane industry has made extraordinary strides to expand production of low carbon renewable fuels for the transportation sector within California. These strides have been made in part thanks to the work of CARB in its implementation of the Low Carbon Fuel Standard. Renewable propane carbon intensities range from half- to one-quarter of the carbon intensity of California's current electric grid. With current blending and transitions to all-renewable fuels, propane has outpaced carbon emissions for California's electric sector in transportation - particularly off-road forklifts.

I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Gregory Leighton
12729 Foothill Blvd
Los Angeles, CA 91342

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 21:35:37

No Duplicates.

Comment 244 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Robert

Last Name: Whitley

Email Address: bob@venturahighwayinc.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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Renewable propane drastically reduces GHG emissions without significant financial investment: The propane industry has made extraordinary strides to expand production of low carbon renewable fuels for the transportation sector within California. These strides have been made in part thanks to the work of CARB in its implementation of the Low Carbon Fuel Standard. Renewable propane carbon intensities range from half- to one-quarter of the carbon intensity of California's current electric grid. With current blending and transitions to all-renewable fuels, propane has outpaced carbon emissions for California's electric sector in transportation - particularly off-road forklifts.

I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Robert Whitley
15313 Santa Gertrudes Ave
La Mirada, CA 90638

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 21:36:49

No Duplicates.

Comment 245 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Eric

Last Name: Li

Email Address: info@famoustargetla.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Eric Li
455 S 6th Ave
City Of Industry, CA 91746

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 21:38:13

No Duplicates.

Comment 246 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Jeri

Last Name: Fisher

Email Address: 7603hazeltine@gmail.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Jeri Fisher
7603 Hazeltine Ave
Los Angeles, CA 91405

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 21:39:45

No Duplicates.

Comment 247 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Thomas

Last Name: Li

Email Address: thomasli@hensunexpress.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Thomas Li
912 W Hillcrest Blvd
Inglewood, CA 90301

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 21:40:29

No Duplicates.

Comment 248 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Oliver

Last Name: Fleck

Email Address: oliverfleck@bisonengineeringco.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Oliver Fleck
15535 Texaco Ave
Paramount, CA 90723

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 21:41:20

No Duplicates.

Comment 249 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Roberto

Last Name: Robaina

Email Address: roberto@robainaindustries.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Roberto Robaina
18000 Studebaker Rd
Cerritos, CA 90703

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 21:42:17

No Duplicates.

Comment 250 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Richard

Last Name: Qin

Email Address: richard@apolloathletics.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Richard Qin
1428 W Central Park Ave S
Anaheim, CA 92802

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 21:43:23

No Duplicates.

Comment 251 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Christopher

Last Name: Park

Email Address: chris@onestoprecyclingla.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Christopher Park
7100 Stanford Ave
Los Angeles, CA 90001

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-22 21:44:09

No Duplicates.

Comment 252 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Michael

Last Name: Caprio

Email Address: mcaprio@republicservices.com

Affiliation: Republic Services

Subject: Proposed Zero-Emission Forklift Regulation

Comment:

To whom it may concern,

Thank you for including our company in the 45 day public comment process for the Zero-Emission Forklift Regulation. We appreciate the approach taken by staff in balancing the time needed to transition from LSI equipment to ZE options.

After review of the Proposed Regulation our comments primarily center upon the exemption of diesel powered units as noted in the ISOR and specifically on Page 4 of the June 27, 2024 Notice of Public Hearing documents. The last sentence of the 3rd full paragraph on this page states:

"Certain types of forklifts, such as rough-terrain forklifts and diesel forklifts, would not be addressed by the Proposed Regulations".

While we may have missed the inclusion of a reference to this exclusion in our review of the Proposed Regulations, we didn't see a specific notation of diesel forklifts being excluded from the Proposed Regulation. This may be inferred as the Proposed Regulation specifically addresses spark ignited forklifts and diesel forklifts are compression ignited.

This distinction is made clear in the second full paragraph on Page 4 of the aforementioned Notice of Public Hearing. However, we believe it would be helpful for the Final Regulation to have a clear reference regarding the exclusion of diesel forklifts. Additionally, the Proposed Regulation references reporting requirements for diesel powered forklifts as well as the need to justify the addition of diesel fueled forklifts in Section 3008(j).

In summary, due to the items noted above we believe that some additional thought be placed into whether diesel fueled forklifts are fully exempt from the Proposed Rule or conditionally exempt if no other ZEV options are available. If the latter is true and/or reporting is required for newly added diesel powered forklifts, as inferred in Section 3008(j), there should be a clear statement in the supporting documents (ISOR, other discussion documents and Notice of Public Hearing) of their inclusion under specific circumstances.

Lastly, Workshops put forth by CARB staff have been very helpful on this and many other proposed rule changes. Given the extent of

comments received and some of our comments noted herein, we believe additional Workshop(s) on this Proposed Regulation (before and/or after it's adoption) would be helpful to address any points requiring further clarification.

We appreciate the consideration of our comments and look forward to participating in the rulemaking process as it progresses.

Regards,

Michael Caprio
Director of Government Affairs

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-25 13:40:57

No Duplicates.

Comment 253 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Matthew

Last Name: Moravek

Email Address: mmoravek@mcclone.net

Affiliation: McClone Construction

Subject: 2023.12 Appendix A-1 Comments

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/259-zeforklifts-ATMCNFJhUjIAKFJj.pdf'

Original File Name: 2023.12. Letter_CARB.pdf

Date and Time Comment Was Submitted: 2023-12-25 18:58:19

No Duplicates.

Comment 254 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Spencer
Last Name: Adams
Email Address: spencer.adams@hyster-yale.com
Affiliation: Hyster-Yale Group, Inc.

Subject: Hyster-Yale Comments to CARB forklift ZEV Proposed Regulations
Comment:

Dear Chair Randolph and CARB Board Members:

Attached please find Hyster-Yale Group, Inc.'s comments to CARB's proposed Zero-Emission Forklift Regulations. Hyster-Yale Group, Inc. has worked collaboratively with CARB throughout this rulemaking process, and respectfully requests that CARB take into account and adjust the Proposed Regulation to both these direct comments from Hyster-Yale Group, Inc. and those separately submitted by the Industrial Truck Association.

Sincerely,

Spencer Adams
Hyster-Yale Group, Inc.

Attachment: 'www.arb.ca.gov/lists/com-attach/260-zeforklifts-AmoGeVcxAw8FYFM8.pdf'

Original File Name: HYG Comments to CARB forklift ZEV regs Dec 26 2023.pdf

Date and Time Comment Was Submitted: 2023-12-26 08:46:06

No Duplicates.

Comment 255 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: David

Last Name: Cox

Email Address: dave@meeder.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

Propane-powered forklifts are the more affordable fuel option: ICE forklift fuel costs decrease substantially when propane fuel costs

are utilized. When propane is used as the fuel of choice for ICE forklifts, ICE forklift fuel costs go down by approximately 55%. Cumulative fuel savings when using propane add up to \$1.87 billion, while cumulative fuel savings when using gasoline amount to \$5.25 billion. Utilizing propane as the main source of fuel for ICE forklifts provides a more accurate depiction of ICE forklift fuel costs as the majority of forklifts are propane-powered. Considering that the fuel savings generated by CARB make up approximately 47% (\$8.2 billion) of CARB's cumulative regulation benefits, transparency on their fuel cost methodology is essential.

Renewable propane drastically reduces GHG emissions without significant financial investment: The propane industry has made extraordinary strides to expand production of low carbon renewable fuels for the transportation sector within California. These strides have been made in part thanks to the work of CARB in its implementation of the Low Carbon Fuel Standard. Renewable propane carbon intensities range from half- to one-quarter of the carbon intensity of California's current electric grid. With current blending and transitions to all-renewable fuels, propane has outpaced carbon emissions for California's electric sector in transportation - particularly off-road forklifts.

I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
David Cox
3495 S Maple Ave
Fresno, CA 93725

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-26 09:14:09

No Duplicates.

Comment 256 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Shane

Last Name: Guenther

Email Address: sugarshayn@gmail.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

Propane-powered forklifts are the more affordable fuel option: ICE forklift fuel costs decrease substantially when propane fuel costs

are utilized. When propane is used as the fuel of choice for ICE forklifts, ICE forklift fuel costs go down by approximately 55%. Cumulative fuel savings when using propane add up to \$1.87 billion, while cumulative fuel savings when using gasoline amount to \$5.25 billion. Utilizing propane as the main source of fuel for ICE forklifts provides a more accurate depiction of ICE forklift fuel costs as the majority of forklifts are propane-powered. Considering that the fuel savings generated by CARB make up approximately 47% (\$8.2 billion) of CARB's cumulative regulation benefits, transparency on their fuel cost methodology is essential.

Renewable propane drastically reduces GHG emissions without significant financial investment: The propane industry has made extraordinary strides to expand production of low carbon renewable fuels for the transportation sector within California. These strides have been made in part thanks to the work of CARB in its implementation of the Low Carbon Fuel Standard. Renewable propane carbon intensities range from half- to one-quarter of the carbon intensity of California's current electric grid. With current blending and transitions to all-renewable fuels, propane has outpaced carbon emissions for California's electric sector in transportation - particularly off-road forklifts.

I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Shane Guenther
6000 10th St Spc 11
Sheridan, CA 95681

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-26 09:15:11

No Duplicates.

Comment 257 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Gary

Last Name: Cross

Email Address: gcross27103@earthlink.net

Affiliation: Industrial Truck Association

Subject: Proposed Zero-Emission Forklift Regulation

Comment:

I am submitting these comments from the Industrial Truck Association again, following my initial submission on Dec. 22, because they do not appear in the log of comments submitted and there is no answer at the Clerk's office.

Attachment: 'www.arb.ca.gov/lists/com-attach/263-zeforklifts-AGNdNAZqUmwHZAdp.docx'

Original File Name: COMMENTS OF THE INDUSTRIAL TRUCK ASSOCIATIO1.docx

Date and Time Comment Was Submitted: 2023-12-26 10:35:12

No Duplicates.

Comment 258 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Roxana

Last Name: Ramirez

Email Address: rramirez@mdwh2o.com

Affiliation: Metropolitan Water District of SC

Subject: MWD's Comments on the Proposed ZEF Regulation

Comment:

Please find attached MWD's comment letter on the 45-day rulemaking draft for the Proposed ZEF Regulation.

Best Regards,

Roxana Ramirez

Environmental Specialist

Water Systems Operations Group

Metropolitan Water District of Southern California

700 North Alameda Street, US8-205

Los Angeles, CA 90012

Office: 213-217-6407

Attachment: 'www.arb.ca.gov/lists/com-attach/264-zeforklifts-VzoAcQdiBAhXMII9.pdf'

Original File Name: MWD Comments on ZE Forklift 45_Day Package_Signed.pdf

Date and Time Comment Was Submitted: 2023-12-26 11:16:28

No Duplicates.

Comment 259 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Priscilla

Last Name: Rodriguez

Email Address: priscilla@agprocessors.org

Affiliation:

Subject: CARB ZEV Forklift Rule_Ag Coalition Comments

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/265-zeforklifts-AWJVMlckWWgBWFlo.pdf'

Original File Name: CARB ZEV Forklift Rule Ag Coalition Comments_Final 2_12-18-23.pdf

Date and Time Comment Was Submitted: 2023-12-26 12:33:57

No Duplicates.

Comment 260 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Dennis

Last Name: Runnels

Email Address: dennis@sierrapropane.net

Affiliation: Windmill Propane

Subject: Zero-Emission Forklifts - Proposed Regulation

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/266-zeforklifts-BmVTNAZ1AjNRcfU5.pdf'

Original File Name: CARB Letter Windmill Dennis Runnels.pdf

Date and Time Comment Was Submitted: 2023-12-26 13:10:49

No Duplicates.

Comment 261 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Patrick

Last Name: Temples

Email Address: ptemples@edplp.net

Affiliation: Campora Propane

Subject: Zero-Emission Forklifts - Proposed Regulation

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/267-zeforklifts-UTIHYANwVmcKUwNv.docx'

Original File Name: CARB Letter Campora Patrick Temples.docx

Date and Time Comment Was Submitted: 2023-12-26 13:39:08

No Duplicates.

Comment 262 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Andy

Last Name: Fellman

Email Address: afellman@edplp.net

Affiliation: Campora Propane

Subject: Zero-Emission Forklifts - Proposed Regulation

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/268-zeforklifts-UTIBZgNwU2IHXgll.pdf'

Original File Name: CARB Letter Campora Andy Fellman.pdf

Date and Time Comment Was Submitted: 2023-12-26 13:59:43

No Duplicates.

Comment 263 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Enrique

Last Name: Silva

Email Address: enriques@expopropane.com

Affiliation: Expo Propane

Subject: Zero-Emission Forklifts - Proposed Regulation

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/269-zeforklifts-UDNSNVMgWWgFXANv.pdf'

Original File Name: CARB Letter Expo Enrique 1.pdf

Date and Time Comment Was Submitted: 2023-12-26 14:24:28

No Duplicates.

Comment 264 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Daniel

Last Name: Fisher

Email Address: dfisher@aednet.org

Affiliation: Associated Equipment Distributors

Subject: ZEF Regulation Forklift Comments--Associated Equipment Distributors

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/270-zeforklifts-UjMGZVw5AH4LbgFg.pdf'

Original File Name: AED-CARBForkliftComments.pdf

Date and Time Comment Was Submitted: 2023-12-26 14:34:59

No Duplicates.

Comment 265 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Veronica

Last Name: Silva

Email Address: veronica@expopropane.com

Affiliation: Expo Propane

Subject: Zero-Emission Forklifts - Proposed Regulation

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/271-zeforklifts-UTJQNwd0AjNRCAVp.pdf'

Original File Name: CARB Letter Expo Veronica Silva.pdf

Date and Time Comment Was Submitted: 2023-12-26 14:24:27

No Duplicates.

Comment 266 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Jorge

Last Name: Rivas

Email Address: jorger@expopropane.com

Affiliation: Expo Propane

Subject: Zero-Emission Forklifts - Proposed Regulation

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/272-zeforklifts-AWJSNQNwV2YFXARo.pdf'

Original File Name: CARB Letter Expo Jorge Rivas.pdf

Date and Time Comment Was Submitted: 2023-12-26 14:24:25

No Duplicates.

Comment 267 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Marty

Last Name: Huerta

Email Address: martyh@expopropane.com

Affiliation: Expo Propane

Subject: Zero-Emission Forklifts - Proposed Regulation

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/273-zeforklifts-VjUCZVwvVWQHxghk.pdf'

Original File Name: CARB Letter Expo Marty Huerta.pdf

Date and Time Comment Was Submitted: 2023-12-26 14:24:25

No Duplicates.

Comment 268 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Sean

Last Name: O'Hara

Email Address: seano@expopropane.com

Affiliation: Expo Propane

Subject: Zero-Emission Forklifts - Proposed Regulation

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/274-zeforklifts-BmUFYgBzUmMCWwll.pdf'

Original File Name: CARB Letter Expo Sean Ohara.pdf

Date and Time Comment Was Submitted: 2023-12-26 14:21:11

No Duplicates.

Comment 269 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Danny

Last Name: Martinez

Email Address: dmartinez@edplp.net

Affiliation: Expo Propane / EDP

Subject: Zero-Emission Forklifts - Proposed Regulation

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/275-zeforklifts-AWJTNFAjBzZQCVI+.pdf'

Original File Name: CARB Letter Expo EDP Danny Martinez.pdf

Date and Time Comment Was Submitted: 2023-12-26 14:46:21

No Duplicates.

Comment 270 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Merle

Last Name: Edington

Email Address: medington@edlp.net

Affiliation: Expo Propane / EDP

Subject: Zero-Emission Forklifts - Proposed Regulation

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/276-zeforklifts-VzRWMVckV2YCW1c7.pdf'

Original File Name: CARB Letter Expo EDP Merle Edington.pdf

Date and Time Comment Was Submitted: 2023-12-26 14:46:20

No Duplicates.

Comment 271 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Jim

Last Name: Rushing

Email Address: jrushing@edlp.net

Affiliation: Expo Propane / EDP

Subject: Zero-Emission Forklifts - Proposed Regulation

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/277-zeforklifts-AGMHYFIhUGEHXgdr.pdf'

Original File Name: CARB Letter Expo EDP Jim Rushing.pdf

Date and Time Comment Was Submitted: 2023-12-26 14:46:19

No Duplicates.

Comment 272 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Jose

Last Name: Cardenas

Email Address: jcardenas@edplp.net

Affiliation: Expo Propane / EDP

Subject: Zero-Emission Forklifts - Proposed Regulation

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/278-zeforklifts-WjIXMAFyV2YGXwdr.pdf'

Original File Name: CARB Letter Expo EDP Jose Cardenas.pdf

Date and Time Comment Was Submitted: 2023-12-26 14:46:18

No Duplicates.

Comment 273 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Chris

Last Name: Daly

Email Address: cdaly@edplp.net

Affiliation: Expo Propane / EDP

Subject: Zero-Emission Forklifts - Proposed Regulation

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/279-zeforklifts-AGMGYZ1UGEHXgBs.pdf'

Original File Name: CARB Letter Expo EDP Chris Daly.pdf

Date and Time Comment Was Submitted: 2023-12-26 14:46:17

No Duplicates.

Comment 274 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Boyd

Last Name: McGathey

Email Address: boyd@edplp.net

Affiliation: Expo Propane / EDP

Subject: Zero-Emission Forklifts - Proposed Regulation

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/280-zeforklifts-AWJXMFYlWWHwDwRo.pdf'

Original File Name: CARB Letter Expo EDP Boyd McGathey.pdf

Date and Time Comment Was Submitted: 2023-12-26 14:46:16

No Duplicates.

Comment 275 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Tom

Last Name: Knauff

Email Address: tknauff@edplp.net

Affiliation: Expo Propane / EDP

Subject: Zero-Emission Forklifts - Proposed Regulation

Comment:

Attachment: "

Original File Name: CARB Letter Expo EDP Tom Knauff.pdf

Date and Time Comment Was Submitted: 2023-12-26 14:46:14

No Duplicates.

Comment 276 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Kathy

Last Name: Johnson

Email Address: kjohnson@edplp.net

Affiliation: Expo Propane / EDP

Subject: Zero-Emission Forklifts - Proposed Regulation

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/282-zeforklifts-UjFRNgFyUWBRCFQ4.pdf'

Original File Name: CARB Letter Expo EDP Kathy Johnson.pdf

Date and Time Comment Was Submitted: 2023-12-26 14:46:12

No Duplicates.

Comment 277 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: John

Last Name: Casper

Email Address: jcasper@edplp.net

Affiliation: Expo Propane / EDP

Subject: Zero-Emission Forklifts - Proposed Regulation

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/283-zeforklifts-BmUBZlIhVmdVDANv.pdf'

Original File Name: CARB Letter Expo EDP John Casper.pdf

Date and Time Comment Was Submitted: 2023-12-26 14:46:11

No Duplicates.

Comment 278 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: David

Last Name: Stroupe

Email Address: dstroupe@edplp.net

Affiliation: Expo Propane / EDP

Subject: Zero-Emission Forklifts - Proposed Regulation

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/284-zeforklifts-UDMCZQd0U2JWDwBs.pdf'

Original File Name: CARB Letter Expo EDP David Stroupe.pdf

Date and Time Comment Was Submitted: 2023-12-26 14:46:08

No Duplicates.

Comment 279 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Travis

Last Name: Myers

Email Address: tmyers@campora.com

Affiliation: Ebbetts Pass Gas Service

Subject: Zero-Emission Forklifts - Proposed Regulation

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/285-zeforklifts-UzBXMF0uUmMAWQBs.pdf'

Original File Name: CARB Letter Ebetts Travis Myers.pdf

Date and Time Comment Was Submitted: 2023-12-26 15:10:21

No Duplicates.

Comment 280 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Jerry

Last Name: Behlen

Email Address: jerry@vmpropane.com

Affiliation: Van Unen Miersma Propane

Subject: Zero-Emission Forklifts - Proposed Regulation

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/286-zeforklifts-UjEFYIEiU2IAWVc7.pdf'

Original File Name: CARB Letter VMP Jerry Behlen.pdf

Date and Time Comment Was Submitted: 2023-12-26 15:10:19

No Duplicates.

Comment 281 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Cathy

Last Name: Adams

Email Address: cadams@edplp.net

Affiliation: Van Unen Miersma Propane / EDP

Subject: Zero-Emission Forklifts - Proposed Regulation

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/287-zeforklifts-WzhdOgR3BTRSCwll.pdf'

Original File Name: CARB Letter VMP EDP Cathy Adams.pdf

Date and Time Comment Was Submitted: 2023-12-26 15:10:19

No Duplicates.

Comment 282 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Dennis

Last Name: Runnels

Email Address: dennis@sierrapropane.net

Affiliation: Sierra Propane

Subject: Zero-Emission Forklifts - Proposed Regulation

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/288-zeforklifts-WzgGYVYIUGEAWVI+.pdf'

Original File Name: CARB Letter Sierra Dennis Runnels.pdf

Date and Time Comment Was Submitted: 2023-12-26 15:10:18

No Duplicates.

Comment 283 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Chris

Last Name: Everett

Email Address: ceverett@fallbrookpropanegas.com

Affiliation: Fallbrook Propane

Subject: Zero-Emission Forklifts - Proposed Regulation

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/289-zeforklifts-AGMBZIIhVWRRRCABs.pdf'

Original File Name: CARB Letter Fallbrook Chris Everett.pdf

Date and Time Comment Was Submitted: 2023-12-26 15:10:17

No Duplicates.

Comment 284 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Todd

Last Name: Wright

Email Address: twright@campora.com

Affiliation: Campora Propane

Subject: Zero-Emission Forklifts - Proposed Regulation

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/290-zeforklifts-UjEBZl0uAjMAWQhk.pdf'

Original File Name: CARB Letter Campora Todd Wright.pdf

Date and Time Comment Was Submitted: 2023-12-26 15:10:16

No Duplicates.

Comment 285 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Mark

Last Name: Price

Email Address: mprice@campora.com

Affiliation: Campora Propane

Subject: Zero-Emission Forklifts - Proposed Regulation

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/291-zeforklifts-BWZRNIUmAjMEXQFt.pdf'

Original File Name: CARB Letter Campora Mark Price.pdf

Date and Time Comment Was Submitted: 2023-12-26 15:10:15

No Duplicates.

Comment 286 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Todd

Last Name: Spicer

Email Address: tspicer@campora.com

Affiliation: Campora Propane

Subject: Zero-Emission Forklifts - Proposed Regulation

Comment:

Attachment: "

Original File Name: CARB Letter Campora Todd Spicer.pdf

Date and Time Comment Was Submitted: 2023-12-26 15:10:14

No Duplicates.

Comment 287 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Travis

Last Name: Myers

Email Address: tmyers@campora.com

Affiliation: Campora Propane

Subject: Zero-Emission Forklifts - Proposed Regulation

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/293-zeforklifts-AWJRNIYIVWQEXQZq.pdf'

Original File Name: CARB Letter Campora Travis Myers 1.pdf

Date and Time Comment Was Submitted: 2023-12-26 15:31:22

No Duplicates.

Comment 288 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Jordan

Last Name: Terlouw

Email Address: jterlouw@campora.com

Affiliation: Campora Propane

Subject: Zero-Emission Forklifts - Proposed Regulation

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/294-zeforklifts-BWZUM1EiBzZVDFA8.pdf'

Original File Name: CARB Letter Campora Jordan Terlouw.pdf

Date and Time Comment Was Submitted: 2023-12-26 15:31:21

No Duplicates.

Comment 289 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Ben

Last Name: de Boer

Email Address: bdeboer@campora.com

Affiliation: Campora Propane

Subject: Zero-Emission Forklifts - Proposed Regulation

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/295-zeforklifts-UDMBZlYlUWBQCQFt.pdf'

Original File Name: CARB Letter Campora Ben de Boer.pdf

Date and Time Comment Was Submitted: 2023-12-26 15:31:20

No Duplicates.

Comment 290 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Denny

Last Name: Justice

Email Address: djustice@campora.com

Affiliation: Campora Propane

Subject: Zero-Emission Forklifts - Proposed Regulation

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/296-zeforklifts-UDNSNQFyVmcGXwJu.pdf'

Original File Name: CARB Letter Campora Denny Justice.pdf

Date and Time Comment Was Submitted: 2023-12-26 15:31:19

No Duplicates.

Comment 291 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Mike

Last Name: Maclaren

Email Address: mmaclaren@campora.com

Affiliation: Campora Propane

Subject: Zero-Emission Forklifts - Proposed Regulation

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/297-zeforklifts-B2QBZlckVGVRCahk.pdf'

Original File Name: CARB Letter Campora Mike Maclaren.pdf

Date and Time Comment Was Submitted: 2023-12-26 15:31:19

No Duplicates.

Comment 292 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Brenda

Last Name: Griffie

Email Address: bgriffie@edplp.net

Affiliation: Campora Propane / EDP

Subject: Zero-Emission Forklifts - Proposed Regulation

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/298-zeforklifts-UzBdOgNwU2JWD1Q4.pdf'

Original File Name: CARB Letter Campora EDP Brenda Griffie.pdf

Date and Time Comment Was Submitted: 2023-12-26 15:31:17

No Duplicates.

Comment 293 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Jon

Last Name: Switalski

Email Address: jon@rebuildsocal.org

Affiliation: Rebuild SoCal Partnership

Subject: Comments on the proposed Zero-Emission Forklift Regulation

Comment:

Attached are the comments from the Rebuild SoCal Partnership regarding the proposed Zero-Emission Forklift regulation.

Attachment: 'www.arb.ca.gov/lists/com-attach/299-zeforklifts-UGIFM1VmAmJQCQFn.pdf'

Original File Name: 2023 Forklift Regulation Comments.pdf

Date and Time Comment Was Submitted: 2023-12-26 15:45:27

No Duplicates.

Comment 294 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Krysta

Last Name: Wanner

Email Address: krysta@westernpga.org

Affiliation: Western Propane Gas Association

Subject: Zero-Emission Forklift Regulation

Comment:

See attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/300-zeforklifts-VixTMFAOVWABaAR2.pdf'

Original File Name: ZE Forklift Letter December 2023 Final.pdf

Date and Time Comment Was Submitted: 2023-12-26 16:20:12

No Duplicates.

Comment 295 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Walter

Last Name: Chang

Email Address: waltminc@gmail.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

Propane-powered forklifts are the more affordable fuel option: ICE forklift fuel costs decrease substantially when propane fuel costs

are utilized. When propane is used as the fuel of choice for ICE forklifts, ICE forklift fuel costs go down by approximately 55%. Cumulative fuel savings when using propane add up to \$1.87 billion, while cumulative fuel savings when using gasoline amount to \$5.25 billion. Utilizing propane as the main source of fuel for ICE forklifts provides a more accurate depiction of ICE forklift fuel costs as the majority of forklifts are propane-powered. Considering that the fuel savings generated by CARB make up approximately 47% (\$8.2 billion) of CARB's cumulative regulation benefits, transparency on their fuel cost methodology is essential.

Renewable propane drastically reduces GHG emissions without significant financial investment: The propane industry has made extraordinary strides to expand production of low carbon renewable fuels for the transportation sector within California. These strides have been made in part thanks to the work of CARB in its implementation of the Low Carbon Fuel Standard. Renewable propane carbon intensities range from half- to one-quarter of the carbon intensity of California's current electric grid. With current blending and transitions to all-renewable fuels, propane has outpaced carbon emissions for California's electric sector in transportation - particularly off-road forklifts.

I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Walter Chang
1788 Rogers Ave
San Jose, CA 95112

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-26 17:11:05

No Duplicates.

Comment 296 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Antonio
Last Name: Montelongo
Email Address: miatrading1@yahoo.com
Affiliation:

Subject: ZE Forklift Regulation
Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

Propane-powered forklifts are the more affordable fuel option: ICE forklift fuel costs decrease substantially when propane fuel costs

are utilized. When propane is used as the fuel of choice for ICE forklifts, ICE forklift fuel costs go down by approximately 55%. Cumulative fuel savings when using propane add up to \$1.87 billion, while cumulative fuel savings when using gasoline amount to \$5.25 billion. Utilizing propane as the main source of fuel for ICE forklifts provides a more accurate depiction of ICE forklift fuel costs as the majority of forklifts are propane-powered. Considering that the fuel savings generated by CARB make up approximately 47% (\$8.2 billion) of CARB's cumulative regulation benefits, transparency on their fuel cost methodology is essential.

Renewable propane drastically reduces GHG emissions without significant financial investment: The propane industry has made extraordinary strides to expand production of low carbon renewable fuels for the transportation sector within California. These strides have been made in part thanks to the work of CARB in its implementation of the Low Carbon Fuel Standard. Renewable propane carbon intensities range from half- to one-quarter of the carbon intensity of California's current electric grid. With current blending and transitions to all-renewable fuels, propane has outpaced carbon emissions for California's electric sector in transportation - particularly off-road forklifts.

I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Antonio Montelongo
2034 E 48th St
Vernon, CA 90058

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-26 17:11:41

No Duplicates.

Comment 297 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Salvador

Last Name: Hernandez

Email Address: sal@dnsexportpacking.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

Propane-powered forklifts are the more affordable fuel option: ICE forklift fuel costs decrease substantially when propane fuel costs

are utilized. When propane is used as the fuel of choice for ICE forklifts, ICE forklift fuel costs go down by approximately 55%. Cumulative fuel savings when using propane add up to \$1.87 billion, while cumulative fuel savings when using gasoline amount to \$5.25 billion. Utilizing propane as the main source of fuel for ICE forklifts provides a more accurate depiction of ICE forklift fuel costs as the majority of forklifts are propane-powered. Considering that the fuel savings generated by CARB make up approximately 47% (\$8.2 billion) of CARB's cumulative regulation benefits, transparency on their fuel cost methodology is essential.

Renewable propane drastically reduces GHG emissions without significant financial investment: The propane industry has made extraordinary strides to expand production of low carbon renewable fuels for the transportation sector within California. These strides have been made in part thanks to the work of CARB in its implementation of the Low Carbon Fuel Standard. Renewable propane carbon intensities range from half- to one-quarter of the carbon intensity of California's current electric grid. With current blending and transitions to all-renewable fuels, propane has outpaced carbon emissions for California's electric sector in transportation - particularly off-road forklifts.

I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Salvador Hernandez
12961 Sunnyside Pl
Santa Fe Springs, CA 90670

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-26 17:13:07

No Duplicates.

Comment 298 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Ryan

Last Name: Donovan

Email Address: rdonovan@stateslogistics.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

Propane-powered forklifts are the more affordable fuel option: ICE forklift fuel costs decrease substantially when propane fuel costs

are utilized. When propane is used as the fuel of choice for ICE forklifts, ICE forklift fuel costs go down by approximately 55%. Cumulative fuel savings when using propane add up to \$1.87 billion, while cumulative fuel savings when using gasoline amount to \$5.25 billion. Utilizing propane as the main source of fuel for ICE forklifts provides a more accurate depiction of ICE forklift fuel costs as the majority of forklifts are propane-powered. Considering that the fuel savings generated by CARB make up approximately 47% (\$8.2 billion) of CARB's cumulative regulation benefits, transparency on their fuel cost methodology is essential.

Renewable propane drastically reduces GHG emissions without significant financial investment: The propane industry has made extraordinary strides to expand production of low carbon renewable fuels for the transportation sector within California. These strides have been made in part thanks to the work of CARB in its implementation of the Low Carbon Fuel Standard. Renewable propane carbon intensities range from half- to one-quarter of the carbon intensity of California's current electric grid. With current blending and transitions to all-renewable fuels, propane has outpaced carbon emissions for California's electric sector in transportation - particularly off-road forklifts.

I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Ryan Donovan
5650 Dolly Ave
Buena Park, CA 90621

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-26 17:14:12

No Duplicates.

Comment 299 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Eric

Last Name: Monson

Email Address: emonson@stateslogistics.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

Propane-powered forklifts are the more affordable fuel option: ICE forklift fuel costs decrease substantially when propane fuel costs

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Renewable propane drastically reduces GHG emissions without significant financial investment: The propane industry has made extraordinary strides to expand production of low carbon renewable fuels for the transportation sector within California. These strides have been made in part thanks to the work of CARB in its implementation of the Low Carbon Fuel Standard. Renewable propane carbon intensities range from half- to one-quarter of the carbon intensity of California's current electric grid. With current blending and transitions to all-renewable fuels, propane has outpaced carbon emissions for California's electric sector in transportation - particularly off-road forklifts.

I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Eric Monson
5650 Dolly Ave
WA 98026

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-26 17:15:06

No Duplicates.

Comment 300 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Eileen

Last Name: Conrique

Email Address: econrique@stateslogistics.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

Propane-powered forklifts are the more affordable fuel option: ICE forklift fuel costs decrease substantially when propane fuel costs

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Eileen Conrique
7102 Cate Dr
Buena Park, CA 90621

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-26 17:16:12

No Duplicates.

Comment 301 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Jesse

Last Name: Sevilla

Email Address: jsevilla@stateslogistics.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Jesse Sevilla
7102 Cate Dr
Buena Park, CA 90621

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-26 17:17:20

No Duplicates.

Comment 302 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Michelle

Last Name: Miller

Email Address: mmiller@stateslogistics.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

Propane-powered forklifts are the more affordable fuel option: ICE forklift fuel costs decrease substantially when propane fuel costs

are utilized. When propane is used as the fuel of choice for ICE forklifts, ICE forklift fuel costs go down by approximately 55%. Cumulative fuel savings when using propane add up to \$1.87 billion, while cumulative fuel savings when using gasoline amount to \$5.25 billion. Utilizing propane as the main source of fuel for ICE forklifts provides a more accurate depiction of ICE forklift fuel costs as the majority of forklifts are propane-powered. Considering that the fuel savings generated by CARB make up approximately 47% (\$8.2 billion) of CARB's cumulative regulation benefits, transparency on their fuel cost methodology is essential.

Renewable propane drastically reduces GHG emissions without significant financial investment: The propane industry has made extraordinary strides to expand production of low carbon renewable fuels for the transportation sector within California. These strides have been made in part thanks to the work of CARB in its implementation of the Low Carbon Fuel Standard. Renewable propane carbon intensities range from half- to one-quarter of the carbon intensity of California's current electric grid. With current blending and transitions to all-renewable fuels, propane has outpaced carbon emissions for California's electric sector in transportation - particularly off-road forklifts.

I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Michelle Miller
6570 Altura Blvd
Buena Park, CA 90620

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-26 17:18:25

No Duplicates.

Comment 303 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Nicole

Last Name: Koerner

Email Address: nkoerner@stateslogistics.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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Renewable propane drastically reduces GHG emissions without significant financial investment: The propane industry has made extraordinary strides to expand production of low carbon renewable fuels for the transportation sector within California. These strides have been made in part thanks to the work of CARB in its implementation of the Low Carbon Fuel Standard. Renewable propane carbon intensities range from half- to one-quarter of the carbon intensity of California's current electric grid. With current blending and transitions to all-renewable fuels, propane has outpaced carbon emissions for California's electric sector in transportation - particularly off-road forklifts.

I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Nicole Koerner
6570 Altura Blvd
Buena Park, CA 90620

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-26 17:19:29

No Duplicates.

Comment 304 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Angelina

Last Name: Martinez

Email Address: amartinez@stateslogistics.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Angelina Martinez
6570 Altura Blvd
CA 90638

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-26 17:20:33

No Duplicates.

Comment 305 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Maytee

Last Name: Cortes

Email Address: mcortes@stateslogistics.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Maytee Cortes
6570 Altura Blvd
Buena Park, CA 90620

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-26 17:21:22

No Duplicates.

Comment 306 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Edgardo

Last Name: Mendoza

Email Address: emendoza@stateslogistics.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Edgardo Mendoza
5650 Dolly Ave
CA 92805

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-26 17:22:10

No Duplicates.

Comment 307 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Briana

Last Name: Radilla

Email Address: bradilla@stateslogistics.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Briana Radilla
6570 Altura Blvd
Buena Park, CA 90620

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-26 17:23:03

No Duplicates.

Comment 308 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Brian

Last Name: Prado

Email Address: bprado@stateslogistics.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Brian Prado
5650 Dolly Ave
Buena Park, CA 90621

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-26 17:23:52

No Duplicates.

Comment 309 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: John

Last Name: Conrique

Email Address: jconrique@stateslogistics.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
John Conrique
5650 Dolly Ave
Buena Park, CA 90621

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-26 17:25:03

No Duplicates.

Comment 310 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Edmund

Last Name: Domingo

Email Address: edomingo@stateslogistics.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

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Regards,
Edmund Domingo
5650 Dolly Ave
Buena Park, CA 90621

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-26 17:25:34

No Duplicates.

Comment 311 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Michelle

Last Name: King

Email Address: michelle.king17@yahoo.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

Propane-powered forklifts are the more affordable fuel option: ICE forklift fuel costs decrease substantially when propane fuel costs

are utilized. When propane is used as the fuel of choice for ICE forklifts, ICE forklift fuel costs go down by approximately 55%. Cumulative fuel savings when using propane add up to \$1.87 billion, while cumulative fuel savings when using gasoline amount to \$5.25 billion. Utilizing propane as the main source of fuel for ICE forklifts provides a more accurate depiction of ICE forklift fuel costs as the majority of forklifts are propane-powered. Considering that the fuel savings generated by CARB make up approximately 47% (\$8.2 billion) of CARB's cumulative regulation benefits, transparency on their fuel cost methodology is essential.

Renewable propane drastically reduces GHG emissions without significant financial investment: The propane industry has made extraordinary strides to expand production of low carbon renewable fuels for the transportation sector within California. These strides have been made in part thanks to the work of CARB in its implementation of the Low Carbon Fuel Standard. Renewable propane carbon intensities range from half- to one-quarter of the carbon intensity of California's current electric grid. With current blending and transitions to all-renewable fuels, propane has outpaced carbon emissions for California's electric sector in transportation - particularly off-road forklifts.

I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Michelle King
13502 Tracy St Apt 2
Baldwin Park, CA 91706

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-26 17:26:23

No Duplicates.

Comment 312 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Arline

Last Name: Ramos

Email Address: aramos@stateslogistics.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Arline Ramos
5650 Dolly Ave
Buena Park, CA 90621

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-26 17:27:09

No Duplicates.

Comment 313 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Jaime

Last Name: Michel

Email Address: jmichel@stateslogistics.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Jaime Michel
6570 Altura Blvd
Buena Park, CA 90620

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-26 17:27:49

No Duplicates.

Comment 314 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Efren

Last Name: Lira

Email Address: elira@stateslogistics.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Efren Lira
11265 Beech Ave
Fontana, CA 92337

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-26 17:28:49

No Duplicates.

Comment 315 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Jose

Last Name: Soto

Email Address: jsoto@stateslogistics.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Jose Soto
6570 Altura Blvd
Buena Park, CA 90620

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-26 17:29:31

No Duplicates.

Comment 316 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Daniel

Last Name: Pla

Email Address: dpla@stateslogistics.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Daniel Pla
6570 Altura Blvd
Buena Park, CA 90620

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-26 17:30:13

No Duplicates.

Comment 317 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Nicolas

Last Name: Sendis

Email Address: nsendis@stateslogistics.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Nicolas Sendis
6570 Altura Blvd
Buena Park, CA 90620

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-26 17:30:56

No Duplicates.

Comment 318 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Aron

Last Name: Gregoire

Email Address: agregoire@stateslogistics.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Aron Gregoire
6872 Ramona Ave
Rancho Cucamonga, CA 91701

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-26 17:31:44

No Duplicates.

Comment 319 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Javier

Last Name: Sotelo

Email Address: jsotelo@stateslogistics.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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Renewable propane drastically reduces GHG emissions without significant financial investment: The propane industry has made extraordinary strides to expand production of low carbon renewable fuels for the transportation sector within California. These strides have been made in part thanks to the work of CARB in its implementation of the Low Carbon Fuel Standard. Renewable propane carbon intensities range from half- to one-quarter of the carbon intensity of California's current electric grid. With current blending and transitions to all-renewable fuels, propane has outpaced carbon emissions for California's electric sector in transportation - particularly off-road forklifts.

I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Javier Sotelo
6570 Altura Blvd
Buena Park, CA 90620

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-26 17:32:26

No Duplicates.

Comment 320 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: John

Last Name: Welch

Email Address: j.welch50@gmail.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
John Welch
1913 N Sundown Ln
Anaheim, CA 92807

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-26 17:33:06

No Duplicates.

Comment 321 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Jerico

Last Name: Jones

Email Address: jjones@stateslogistics.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Jerico Jones
6570 Altura Blvd
Buena Park, CA 90620

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-26 17:33:46

No Duplicates.

Comment 322 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Gabriel

Last Name: Rodriguez

Email Address: grodriguez@stateslogistics.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Gabriel Rodriguez
5650 Dolly Ave
Buena Park, CA 90621

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-26 17:34:27

No Duplicates.

Comment 323 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Kevin

Last Name: Monson

Email Address: thurmy7@yahoo.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

Propane-powered forklifts are the more affordable fuel option: ICE forklift fuel costs decrease substantially when propane fuel costs

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Kevin Monson
350 Del Cerro Pl
Fullerton, CA 92835

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-26 17:35:37

No Duplicates.

Comment 324 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Helder

Last Name: Faria

Email Address: hfaria@dassels.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Helder Faria
31 Wright Rd
Hollister, CA 95023

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-26 17:36:21

No Duplicates.

Comment 325 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Bryan

Last Name: Rogers

Email Address: brogers@dassels.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Bryan Rogers
31 Wright Rd
Hollister, CA 95023

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-26 17:37:05

No Duplicates.

Comment 326 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Michael
Last Name: Graham
Email Address: mgraham@dassels.com
Affiliation:

Subject: ZE Forklift Regulation
Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Michael Graham
31 Wright Rd
Hollister, CA 95023

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-26 17:37:47

No Duplicates.

Comment 327 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Julian

Last Name: Gomez

Email Address: jgomez@dassels.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Julian Gomez
31 Wright Rd
Hollister, CA 95023

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-26 17:38:29

No Duplicates.

Comment 328 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Victor
Last Name: Zendejas
Email Address: vzendejas@dassels.com
Affiliation:

Subject: ZE Forklift Regulation
Comment:

Dear Chair Randolph,

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Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

Propane-powered forklifts are the more affordable fuel option: ICE forklift fuel costs decrease substantially when propane fuel costs

are utilized. When propane is used as the fuel of choice for ICE forklifts, ICE forklift fuel costs go down by approximately 55%. Cumulative fuel savings when using propane add up to \$1.87 billion, while cumulative fuel savings when using gasoline amount to \$5.25 billion. Utilizing propane as the main source of fuel for ICE forklifts provides a more accurate depiction of ICE forklift fuel costs as the majority of forklifts are propane-powered. Considering that the fuel savings generated by CARB make up approximately 47% (\$8.2 billion) of CARB's cumulative regulation benefits, transparency on their fuel cost methodology is essential.

Renewable propane drastically reduces GHG emissions without significant financial investment: The propane industry has made extraordinary strides to expand production of low carbon renewable fuels for the transportation sector within California. These strides have been made in part thanks to the work of CARB in its implementation of the Low Carbon Fuel Standard. Renewable propane carbon intensities range from half- to one-quarter of the carbon intensity of California's current electric grid. With current blending and transitions to all-renewable fuels, propane has outpaced carbon emissions for California's electric sector in transportation - particularly off-road forklifts.

I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Victor Zendejas
31 Wright Rd
Hollister, CA 95023

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-26 17:39:23

No Duplicates.

Comment 329 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Rocco

Last Name: Biafore

Email Address: rbiafore@dassels.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Rocco Biafore
31 Wright Rd
Hollister, CA 95023

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-26 17:40:15

No Duplicates.

Comment 330 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Kirk

Last Name: Hellofs

Email Address: khellofs@stateslogistics.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Kirk Hellofs
5650 Dolly Ave
Buena Park, CA 90621

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-26 17:41:06

No Duplicates.

Comment 331 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Steven

Last Name: Valverde

Email Address: steven@teecoproducts.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

Technical challenges of run time & operational loads could impact overall cost: While CARB noted that "opportunity charging" may resolve use needs, manufacturers and industry experts remain skeptical that there is a one-to-one replacement for ICE forklifts versus battery electric. Considering an 8-hour use period, 8-hour charge period, and 8-hour battery cool down period for the bulk of existing battery electric forklifts, it would actually be a three-to-one replacement for businesses utilizing 24-hour shifts. Such ratios would significantly increase the total financial impact of this regulation. In addition, lift capacities of battery electric units can make real-world runtimes for heavier loads much lower than rated capacities.

Burdensome costs to forklift owners and operators: CARB's Standardized Regulatory Impact Assessment (SRIA) estimates that the proposed regulation will result in cumulative savings of over \$13.9 billion. Unfortunately, analysis undertaken by Andrew Chang & Company, a consultant hired to determine the potential savings or costs from the rulemaking, has shown quite the opposite. In total, the proposed regulations will cost forklift owners and operators as much as \$28 billion in extra expenses. Even under midpoint estimates, owners and operators must bear nearly \$20 billion in costs.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Steven Valverde
16881 Armstrong Ave
Irvine, CA 92606

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-26 17:41:39

No Duplicates.

Comment 332 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Mariah

Last Name: Arredondo

Email Address: mariaharredondo4@gmail.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Mariah Arredondo
5650 Dolly Ave
Buena Park, CA 90621

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-26 17:42:30

No Duplicates.

Comment 333 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Veronica

Last Name: Gomez

Email Address: vgomez@stateslogistics.com

Affiliation:

Subject: ZE Forklift Regulation

Comment:

Dear Chair Randolph,

While the proposed regulation has been amended to address some industry concerns, there are still significant issues with the rulemaking that must be acknowledged including cost, feasibility of implementation, and inaccuracies of data in CARB's analysis. Main points of contention are as follows:

Actual impacted forklifts far exceed CARB estimate: CARB has modelled the total affected forklifts of approximately 95,000, though this inventory count is less than a third of the values produced from the 2017 CARB/SSRC Study. CARB assumes that the internal combustion engine (ICE) forklift population remains stagnant though time has shown an increase in forklifts in the state due to an increase in goods movement. After evaluating forklift fleet owners and operators, CARB's proposal will actually impact over 390,000 ICE forklifts - over three out of every four forklifts in the state.

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I appreciate the opportunity to submit this document regarding the rulemaking in hopes of adopting an equitable solution for forklift owners and operators.

Regards,
Veronica Gomez
7102 Cate Dr
Buena Park, CA 90621

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-26 17:43:29

No Duplicates.

Comment 334 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Daniel

Last Name: Fisher

Email Address: dfisher@aednet.org

Affiliation: Associated Equipment Distributors

Subject: AED ZEF Forklift Regulation Comments

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/340-zeforklifts-UjMBYIA1WCZSN1Iz.pdf'

Original File Name: AED-CARBForkliftComments.pdf

Date and Time Comment Was Submitted: 2023-12-26 18:02:05

No Duplicates.

Comment 335 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Priscilla

Last Name: Rodriguez

Email Address: priscilla@agprocessors.org

Affiliation: WAPA

Subject: CARB ZEV Forklift Rule_Ag Coalition Comments

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/341-zeforklifts-VixTM1VmU2JWoM0d.pdf'

Original File Name: CARB ZEV Forklift Rule Ag Coalition Comments_Final 3_12-18-23.pdf

Date and Time Comment Was Submitted: 2023-12-26 20:03:24

No Duplicates.

Comment 336 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Christine

Last Name: Luther Zimmerman

Email Address: Non-web submitted comment

Affiliation: WSPA

Subject: Comments on the CARB Public Hearing to Consider the Proposed Zero-Emission Forklift Regula

Comment:

Please see attached file.

Attachment: 'www.arb.ca.gov/lists/com-attach/2-0-ViEGcwd2BzUHXlAz.pdf'

Original File Name: wspa comment.pdf

Date and Time Comment Was Submitted: 2024-01-18 11:04:36

No Duplicates.

Comment 337 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 45 Day.

First Name: Yuying

Last Name: Ma

Email Address: yuying.ma@dot.ca.gov

Affiliation: Office of Aviation Planning

Subject: Zero Emission Forklift Regulation - Draft EIA Review

Comment:

Please see attached file.

Attachment: 'www.arb.ca.gov/lists/com-attach/349-zeforklifts-AGNWMVE8ByAHc1Iz.pdf'

Original File Name: Caltrans EIA comment 12212024.pdf

Date and Time Comment Was Submitted: 2024-06-05 11:26:28

No Duplicates.

Comment 1 for Proposed Zero-Emission Forklift Regulation (zeforklifts). (At Hearing)

First Name: Larry

Last Name: Schroeder

Email Address: larrykf11@gmail.com

Affiliation:

Subject: Zero-Emission Forklift

Comment:

With California importing 30% of its Electricity and with 48.7% coming from the burning of Fossil Fuels. How does Zero Emissions Forklifts impact emission output from adding an increase to the electric grid? Also with a lot of forklift being charged at night can you confirm the public's off peak electric rate will not increase because of this new regulation?

Thank you,

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-06-27 10:47:38

No Duplicates.

Comment 2 for Proposed Zero-Emission Forklift Regulation (zeforklifts). (At Hearing)

First Name: Andrea

Last Name: Woods

Email Address: andrea@jbdewar.com

Affiliation: JB Dewar

Subject: Zero-Emission Forklifts

Comment:

Please do not consider zero-emission forklifts, they are infeasible, and the electric support structure cannot support more electric demand.

Thank you,

Andrea

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-06-27 11:29:14

No Duplicates.

Comment 3 for Proposed Zero-Emission Forklift Regulation (zeforklifts). (At Hearing)

First Name: Kris

Last Name: Flaig

Email Address: kris.flaig@lacity.org

Affiliation:

Subject: Zero-Emission Forklift Regulation - Economics for small businesses

Comment:

Sir/Madam,

It seems that California will lose some number of jobs and businesses with adoption of this rule. There is no question about that. But, this regulation can go into full effect, IF CARB supports financing of the forklifts for any of the industries or small businesses that have voiced such challenges. Use of propane seems to also be a verifiably life cycle winner of lower emissions when compared to electric forklifts.

So, unless CARB provides this financing, people will lose their jobs and owners will lose their businesses, unless the less expensive propane forklifts are allowed.

Unless CARB levels the field by providing free or zero-interest loans to each small business or essential public service who must buy one or more forklift, especially those who might need to buy three electric units to replace each existing unit, but must buy such forklift(s) at a cashflow loss for several years before then can break even.

Or, unless CARB comes to its senses regarding life cycle emissions of propane forklifts versus "clean" energy.

This seems like a safe bet for CARB and the people of California.

Respectfully yours,

Kris Flaig, PE

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-06-27 11:35:22

No Duplicates.

Comment 1 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 15-1.

First Name: Matthew

Last Name: Moravek

Email Address: mmoravek@mcclone.net

Affiliation: McClone Construction

Subject: Attachment A-1 Proposed 15-Day Changes

Comment:

Attachment: www.arb.ca.gov/lists/com-attach/343-zeforklifts-VTRUJIMmBzUKbwhg.pdf

Original File Name: Attachment A-1 Proposed 15-Day Changes.pdf

Date and Time Comment Was Submitted: 2024-05-31 14:00:39

No Duplicates.

Comment 2 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 15-1.

First Name: Michael

Last Name: Caprio

Email Address: mcaprio@republicservices.com

Affiliation: Republic Services

Subject: 15 Day Zero-Emission Forklift Regulation

Comment:

This is a point of clarification relative to Section 3007(b)3B1(c&d) - Page 47 - Fleet Eligibility Criteria for an Infrastructure Site Electrification Delay.

Republic Services has nearly 50 operating locations in CA with at least one affected forklift. Most of the facilities don't have a large number of forklifts (generally 1 per site) with the exception being our recycling plants which may have 3-4 forklifts at each location (there are 3 such facilities statewide). These locations are served by a wide range of public and municipal utilities.

Subdivision c of this section notes that in order for the extension request to be considered the "Fleet Operator has deployed the maximum number of ZEFs that can be supported by the electric utility provider". Due to the limited number of ZEF at each location, the number deployed will most likely be zero since the issue will be access to power or Construction Delays as noted below. There will be limited ability to move units between locations as is required in subdivision d of this section. This will be challenging due to the limited number of units at each site to start with (ie. 1 at most locations that is needed for continuation of operations at that location).

This is more of an FYI and that this type of situation may arise with several company's like ours that operate numerous locations throughout the state that have only 1 forklift. As such, our ability to power and deploy any forklifts at the site if there is an Infrastructure Site Electrification Delay or relocate units from another location and remain in compliance as we Phase Out certain model years will be extremely limited. This may also be the case for Infrastructure Construction Delay Extension requests (outlined on Page 44) as the criteria for receiving the extension are similar to the Electrification Delay criteria.

The reporting platform to be developed by CARB should allow us to map this out for CARB staff as it will be a complete listing of all of our units that operate in the state. We note this here as there is at times a tendency to view large corporations as having the resources to cover their needs state wide and just simply transfer spare equipment between locations. However, the Phase-Out Criteria along with the manufacturer, dealer and rental restrictions contained within the regulation could make it difficult to gain access to qualified forklifts as there will be a higher demand on compliant units throughout the state for all sectors. As noted, there will not be a surplus of spare units that are compliant

within our company pool due to the limited number at each location that are needed to continue operations at each site.

Just noting this so that if and when a situation such as the one described herein does arise, all of the factors noted are taken into consideration when reviewing the extension request. The interaction with several utilities will also complicate matters in this regard and since our Fleet will be viewed as an aggregate of our statewide position (due to the provisions in the Common Ownership or Control definition) the extension request will most likely involve information from multiple locations and multiple utilities.

Appreciate CARB staff's consideration of this note as well as clarifications made on comments we submitted on the 45 day rule (ie. are diesel powered forklifts governed by the rule or not).

Regards,

Michael Caprio
Director of Government Affairs - CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-05-31 14:49:33

No Duplicates.

Comment 3 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 15-1.

First Name: Bob

Last Name: Shepherd

Email Address: bshepherd@quinncompany.com

Affiliation: The California Caterpillar Dealers

Subject: Zero-Emission Forklift Regulation - 15 Day Comments

Comment:

Please see the attached.

Attachment: www.arb.ca.gov/lists/com-attach/345-zeforklifts-B2AFbFYhUWdSJIM9.pdf

Original File Name: Governing Board Comments - 15-Day - Proposed Zero-Emission Forklift Regulation.pdf

Date and Time Comment Was Submitted: 2024-06-03 14:21:05

No Duplicates.

Comment 4 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 15-1.

First Name: Rosalie

Last Name: Barcinas

Email Address: Rosalie.Barcinas@sce.com

Affiliation: SCE

Subject: Comments on Proposed 15-day Changes to the Zero-Emission Forklift Regulation
Comment:

SCE supports a successful Zero Emission Forklift (ZEF) Regulation and requests that CARB eliminate the requirement for the customer to provide either historical billing or usage data in support of the Infrastructure Site Electrification Delay Extension.

Attachment: www.arb.ca.gov/lists/com-attach/346-zeforklifts-VWVTY1Z5BWZWZQgm.pdf

Original File Name: 06.05.2024.SCE ZE Forklift Comments.pdf

Date and Time Comment Was Submitted: 2024-06-04 17:54:48

No Duplicates.

Comment 5 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 15-1.

First Name: Luke

Last Name: Webber

Email Address: luke.webber@logisnextamericas.com

Affiliation:

Subject: 15 Day Public Comment

Comment:

Thank you for taking these comments into consideration during the development of the regulatory draft.

In addition, i also reviewed comments from Mr. Shephard (California Caterpillar Dealers) and also support CARB's efforts to consider this important feedback.

Attachment: www.arb.ca.gov/lists/com-attach/347-zeforklifts-WzhRNlAjVWRVDAd9.docx

Original File Name: CARB ZEF 15 day draft comments.docx

Date and Time Comment Was Submitted: 2024-06-05 09:11:49

No Duplicates.

Comment 6 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 15-1.

First Name: Robert
Last Name: Spiegel
Email Address: rspiegel@cmta.net
Affiliation: CMTA

Subject: Zero-Emission Forklift Regulation - 15 Day Comments
Comment:

Please see the attached comments from the California Manufacturers
& Technology Association (CMTA).

Attachment: www.arb.ca.gov/lists/com-attach/348-zeforklifts-UjFcN1wpVGyDWgIv.pdf

Original File Name: CMTA - ZEF 15-Day Comments 6.05.24 .pdf

Date and Time Comment Was Submitted: 2024-06-05 11:01:37

No Duplicates.

Comment 7 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 15-1.

First Name: Tommy

Last Name: Goodwin

Email Address: tommy.goodwin@exhibitionsconferencesalliance.org

Affiliation: Exhibitions & Conferences Alliance

Subject: ECA CARB ZEF 15-day comments

Comment:

Please see attached. Thank you.

Attachment: www.arb.ca.gov/lists/com-attach/350-zeforklifts-V2UGMFJhVDMKIQAw.pdf

Original File Name: 2024-06-05 -- ECA CARB ZEF 15-day comments.pdf

Date and Time Comment Was Submitted: 2024-06-05 13:14:37

No Duplicates.

Comment 8 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 15-1.

First Name: Alison

Last Name: Hahm

Email Address: ahahm@nrdc.org

Affiliation: T.H.E. Impact Project & Coalition Allies

Subject: Comments on CARB Zero-Emission Forklifts Regulation

Comment:

Dear Chair Randolph and Members of the Board,

On behalf of Earthjustice, NRDC, Sierra Club, CCAEJ, CCA, Pacific Environment, SPPHC, WLBA, and EYCEJ, we submit this comment letter regarding the proposed 15-day changes to the California Air Resources Board's Zero-Emission Forklift Rulemaking.

We appreciate CARB's hard work on the ZE Forklifts Regulation. In order to address the air quality challenges in California, we need to transition every segment of our transportation sector to zero-missions. This regulation is an important step in that direction, but we urge CARB to adopt a more ambitious proposal that will bring us to 100 percent zero-emission forklifts by 2035.

Thank you for your consideration of our comments.

Attachment: www.arb.ca.gov/lists/com-attach/351-zeforklifts-ADZWfVFIVCpRZVRg.pdf

Original File Name: 6-5-24 Impact Project ZE Forklifts Letter_Final.pdf

Date and Time Comment Was Submitted: 2024-06-05 14:49:51

No Duplicates.

Comment 9 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 15-1.

First Name: James

Last Name: Simonelli

Email Address: james@metalscoalition.com

Affiliation: California Metals Coalition

Subject: Comments on 15-day Zero Emission Forklift Regulation

Comment:

Thank you for the opportunity to comment. Please see attached.

Attachment: www.arb.ca.gov/lists/com-attach/352-zeforklifts-BjcFNgYqUWZWVcu.pdf

Original File Name: 15-DAY_ZEF_Comments_CMC_June5.pdf

Date and Time Comment Was Submitted: 2024-06-05 15:59:17

No Duplicates.

Comment 10 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 15-1.

First Name: Allegra

Last Name: Curiel

Email Address: allegrac@cceeb.org

Affiliation: CCEEB

Subject: RE: Proposed Zero-Emission Forklift 15-Day Regulatory Package

Comment:

Attachment: www.arb.ca.gov/lists/com-attach/353-zeforklifts-UjFTNgZiVGJXM1UK.pdf

Original File Name: CCEEB ZEF 15 Day 06.05.24.pdf

Date and Time Comment Was Submitted: 2024-06-05 16:49:57

No Duplicates.

Comment 11 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 15-1.

First Name: Priscilla

Last Name: Rodriguez

Email Address: priscilla@ccgga.org

Affiliation:

Subject: Proposed ZEV Forklift Rule Ag Coalition Comments

Comment:

Please see attachment.

Attachment: www.arb.ca.gov/lists/com-attach/354-zeforklifts-AWJSNVAjBDVXDgJ4.pdf

Original File Name: CARB ZEV Forklift Rule Ag Coalition Comments_Final_ 6-5-24.pdf

Date and Time Comment Was Submitted: 2024-06-05 16:57:53

No Duplicates.

Comment 12 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 15-1.

First Name: Karen

Last Name: Mann

Email Address: kmann@trccompanies.com

Affiliation: TRC

Subject: Lower Phase-Out Cap for Large Fleets and Modifications to Infrastructure Extensions
Comment:

Attachment: www.arb.ca.gov/lists/com-attach/355-zeforklifts-VSFUIFc1VVkHYgJt.pdf

Original File Name: TRC Comments on ZE Forklift Regulation.pdf

Date and Time Comment Was Submitted: 2024-06-05 17:49:13

No Duplicates.

Comment 13 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 15-1.

First Name: Jacob

Last Name: Asare

Email Address: jasare@aednet.org

Affiliation: State Government Affairs Manager - AED

Subject: Zero-Emission Forklift Regulation Proposed 15-Day Modifications

Comment:

Attachment: www.arb.ca.gov/lists/com-attach/356-zeforklifts-VjcGZVYzUixVMFU0.pdf

Original File Name: AED-CARBForkliftComments-15Day.pdf

Date and Time Comment Was Submitted: 2024-06-05 17:44:43

No Duplicates.

Comment 14 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 15-1.

First Name: Michael

Last Name: Lewis

Email Address: mike@lewisandco.net

Affiliation: CIAQC

Subject: Forklift comments

Comment:

Attachment: www.arb.ca.gov/lists/com-attach/357-zeforklifts-USFVIQBuaIEBaFck.pdf

Original File Name: Proposed Zero-Emission Forklift Regulation – 15-Day Comments (1).pdf

Date and Time Comment Was Submitted: 2024-06-05 19:38:57

No Duplicates.

Comment 15 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 15-1.

First Name: Bridget

Last Name: McLeavy

Email Address: mcleavyb@emwd.org

Affiliation: Eastern Municipal Water District

Subject: Clarification Compliance Dt - Alternative Schedule for LSI Small Fleet

Comment:

Please see attached file.

Attachment: www.arb.ca.gov/lists/com-attach/359-zeforklifts-AWJTOVAwWXgFagZg.pdf

Original File Name: Clarification Compliance DT - Alternative Schedule for LSI Small Fleet.pdf

Date and Time Comment Was Submitted: 2024-06-11 12:19:00

No Duplicates.

Comment 16 for Proposed Zero-Emission Forklift Regulation (zeforklifts) - 15-1.

First Name: Michael

Last Name: Villanueva

Email Address: mvillanueva@syaslparkers.com

Affiliation: WPGA

Subject: ZEForklifts Regulation

Comment:

Please see attached File

Attachment: www.arb.ca.gov/lists/com-attach/362-zeforklifts-USZQJgNIWGoLUgVm.pdf

Original File Name: WPGA Comments.pdf

Date and Time Comment Was Submitted: 2024-06-14 15:13:19

No Duplicates.