



# CALIFORNIA METALS COALITION

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June 5, 2024

Clerk of the Board  
California Air Resources Board  
1001 I Street  
Sacramento, California 95814

**Subject: 15-Day Comments on Proposed Zero-Emission Forklift (ZEF) Regulation**

Dear Chair Randolph and CARB Board Members,

The California Metals Coalition (CMC) appreciates the opportunity to comment on the California Air Resources Board (CARB) proceedings and consideration of the zero-emission forklift (ZEF) regulation.

## **BACKGROUND**

California is home to approximately 4,000 advanced metal manufacturing facilities, employing over 315,000 Californians<sup>1</sup>. 8 out of 10 employees in the metalworking sector reside in economically disadvantaged communities. The average metals industry salary is \$80,000/year, which means a job in the metal manufacturing sector is often the only path to the middle class for many of these Californians.

CMC members use recycled metal (ex: aluminum, brass, iron, steel, etc.) to make new parts for medical devices, aerospace, clean energy technologies, electric cars, biotech apparatuses, national defense, agriculture, infrastructure, construction machinery, household appliances, food processing and storage, movement of water, and millions of other products demanded by Californians.

California is arguably home to some of the most advanced metal manufacturing plants in the world. The depth of technological advancements, research and development, pollution controls, and worker opportunities at a California metal business is unmatched.

CMC members continue to search for more ways to efficiently reduce waste, and we support balanced approaches to emission reductions that equally consider both economic and environmental benefits.

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<sup>1</sup> [www.metalscoalition.com/metals-industry.html](http://www.metalscoalition.com/metals-industry.html)

## **Comments on Proposed Zero-Emission Forklift (ZEF) Regulation**

CMC has numerous members that have already implemented zero-emission forklifts. We have proactively embraced the potential of this equipment.

But it is critical for metal manufacturers to have a balanced mix within their forklift fleet. Having a 100% battery powered fleet is very risky due to the instability of the California power grid (both reliability and cost).

As a result, CARB staff should:

1. Include a fleet mix option with lower emission standards for LSI engines.
2. Include a fleet mix option with renewable propane.
3. Include a fleet mix option with emissions filtering—similar to a catalytic converter.
4. Include incentives for industries such as metal manufacturing that already pay the nation's highest electricity costs.
5. Include fleet options for industries such as metal manufacturing that are large consumers of electricity and are already subject to interruptions.

Until these the above issues can be made a part of this regulation, we ask this Board to not approve this regulation and instruct staff to re-visit the regulation to provide a mix of alternatives that can achieve a balanced approach.

### **Closing**

Thank you in advance for your time, and for allowing CMC to participate and comment on the ZEF regulation. We look forward to more working group meetings and continued discussions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'James Simonelli', with a stylized flourish extending to the right.

James Simonelli  
Executive Director