

We have some concerns / comments about the proposed language in Appendix A-1.

While most of the extension requests seem unrealistic (as detailed in Scott's letter to Mr. Keith Roderick on 3/22/2023), the only extension that we see feasible for anyone in our industry, is the Technical Infeasibility Extension. However, it is not without issues. While the intent seems reasonable, the required documentation to submit would be near impossible. Another issue that we do not think the California Air Resource Board (CARB) fully understands is that there will **always** be a need for an LPG or Internal Combustion Forklift on all job sites where permanent infrastructure has yet to be established.

These fleets are deployed to the jobsite for a temporary amount of time and were never intended to be a permanent fixture. This would hold relevance to CARBs 100% phase out in 2038. The idea that regulation would spur technology is not responsible to Fleet Operators and would only do a disservice to the construction industry.

It is not the intention to suggest we are not open to change. However, the fact that jobsites under construction do not have the proper infrastructure in place, those temporary deployed fleets need to be 100% excluded.



The use of LPGs or Internal Combustion Forklifts need to be at the discretion of the Fleet Operator. In an effort maintain responsibility, we could see that the Fleet Operator maintains records to justify their use if requested by CARB.

Respectfully,

Mathew Moravek

McClone Construction