



December 26, 2023

SUBMITTED ELECTRONICALLY

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

Re: Zero-Emission Forklift Proposed Regulation Comments – December 2023

Dear Chair Randolph, and CARB Board Members:

The Rebuild SoCal Partnership (Partnership) appreciates the opportunity to provide comments on the Zero-Emission Forklift proposed regulation proposed by the California Air Resources Board's (CARB).

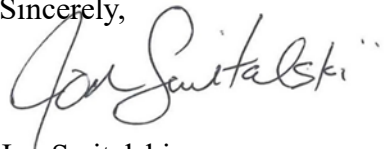
The Partnership consists of 2,750 contractors throughout Southern California that represent more than 90,000 union workers in all 12 Southern California counties. Based in Anaheim, California – the Partnership is dedicated to working with elected officials and educating the public in Southern California on the continued need for infrastructure funding and to enhance the regions' workforce development while creating career construction jobs. The Partnership is dedicated to advocating for clean water, safe bridges and roads, which are vital to Southern California's economy. A well-designed and maintained infrastructure is essential to our quality of life. With a primary focus on Southern California projects, the Rebuild SoCal Partnership and our community advocates for responsible investment in public infrastructure projects to help fix our aging public systems, while building for our future needs and economic growth.

After reviewing the latest proposed draft of the Zero-Emission Forklift regulation, the Partnership is concerned with the substantial amount of changes made from the prior draft version released for public review in March 2023. We are also concerned with the very limited amount of time the public was afforded to review and provide comments on those changes (for example the comment deadline is the day after the Christmas holiday). To that end, we would respectfully request that CARB consider conducting a public workshop sometime during the seven-month period that will transpire prior to the scheduled adoption hearing next year.

In regards to specific concerns regarding the draft regulation, we concur with the comments submitted by the Construction Industry Air Quality Coalition. The proposed regulation and other rulemaking proceedings currently underway create uncertainty as to how our members are expected to comply with one mandate this year but then be asked to transition and comply with a totally different goal or objective which requires the need to purchase or try to purchase new vehicles regardless of costs and performance.

Thank you for considering our comments and the comments submitted by the Construction Industry Air Quality Coalition.

Sincerely,

A handwritten signature in black ink that reads "Jon Switalski". The signature is written in a cursive style with a large initial "J" and "S".

Jon Switalski  
Executive Director  
Rebuild SoCal Partnership