1. Sale of new MY 2025 LSI forklifts in calendar year 2026.

MLA Request to CARB in 15 Day Comment Period: All MY 2025 forklifts can be sold in calendar year 2026. Remove the word “inventory” where applicable.

* 1. Current language is confusing. Modification 26 allows dealers to sell MY 2025’s in dealer inventory while Modification 24 does not specify in dealer inventory.
  2. “In dealer inventory” and “inventory” is not defined.
  3. Relevant Modifications:

                                                                              i.        Modification 24: allows dealers to sell new 2025 forklifts until the end of 2026

                                                                            ii.        Modification 26: “….would allow Dealers to sell new MY 2025 LSI Forklifts that they have in their inventory through the end of calendar year 2026. This change is being made to allow Dealers to sell new 2025 MY LSI Forklifts until the end of 2026 so that such Dealers would be able to clear inventory remaining at the end of 2025.”

1. Denials of Operational Extensions.

MLA Request to CARB in 15 Day Comment Period: Specify how extension deadlines could be extended for a fleet operator who is denied an operational extension.

* 1. Relevant Modifications:

                                                                              i.        Modification 112: states that fleet operators who are denied an operational extension may apply for a ZEF delivery delay extension, infrastructure delay extension, and infrastructure site electrification delay extension. “Text is being added that lists specific sections of the aforementioned extensions with deadlines that might otherwise limit the Fleet Operator’s eligibility to apply for the extensions. Notwithstanding these sections, the Fleet Operator is eligible to apply for the extensions, provided that applications are submitted within 135 calendar days of the expiration of, or denial of a request for an Operational Extension.”

* 1. How will the deadlines be altered? For example, the delivery delay extension requires that the fleet operator submit an order for a ZEF two years in advance of the deadline. That is impossible in the above scenario.
  2. Need detailed “how to” guide