



September 12th, 2022

Ms. Liane Randolph, Chair
California Air Resources Board
1001 I Street, Sacramento, California 95814

Subject: Transfer Flow, Inc.'s Public Comment on the 2022 State Implementation Plan

Dear Chair Randolph:

Transfer Flow appreciates the opportunity to provide comments on the California Air Resources Board (CARB) state strategy for the State Implementation Plan.

Transfer Flow has been in business in Northern California for 39 years manufacturing liquid fuel systems, and as such, we are experts in the industry. Transfer Flow would like to warn CARB staff that their singular technology bias of converting all transportation technologies to only battery-electric or fuel cell-electric is not only impractical but also runs the risk of undermining CARB's intended effects of reducing vehicular emissions. If CARB does not get this right, it only serves to postpone meaningful change within the industry. Although on page 28 of the State Implementation Plan Strategy, CARB staff writes, "CARB staff engaged in an open public process in developing the Proposed 2022 State SIP Strategy." CARB staff has ignored the concerns of industry experts regarding the shortcomings of CARB's various all-electric mandates. We believe that CARB ignoring the warnings of industry experts will come back to hurt Californians.

CARB staff appears so enamored by the idea of all-electric vehicles that it seems they cannot make a logical decision regarding the practicality of what they are proposing. If CARB truly wanted to see meaningful change within the industry, CARB would take stakeholders' concerns seriously. CARB has not responded to stakeholder concerns, and we believe that CARB cannot respond because there is no logic behind CARB's reasoning.

Unfortunately, many of the technologies CARB is attempting to mandate are still in development and will not reach commercial viability anytime soon. CARB's failing to recognize that ZEVs are not feasible in many applications and may never be feasible for some applications only serves to undermine the goal



CARB is trying to achieve. CARB's lack of a fuel and technology-neutral approach serves as a backstop to continue the use of petroleum-based fuels while waiting for a lengthy and expensive build-out of electric infrastructure to be completed.

If CARB were genuinely dedicated to rapid and deep emissions reductions from mobile sources, then CARB would evaluate all strategies that can maximize air quality benefits. Low-carbon fuel options can provide consumers with an immediate and affordable path to energy sustainability without needing to wait for the build-out of costly infrastructure investments. Transfer Flow believes low-NOx renewable fuels are the most cost-effective way to address greenhouse gasses and NOx emissions in the transportation sector, especially in the near term.

Even though CARB could continue reducing emissions today, CARB has chosen to support some pie-in-the-sky ideas that may not even turn out to be feasible. CARB is gambling with unadopted and unproven regulatory programs by putting all its eggs in one electric-vehicle basket. If those regulatory programs fail and CARB has not developed a backup plan to adequately address mobile source emissions, Transfer Flow believes CARB's credibility will be brought into question.

CARB purposely omitting sustainable fuels is a disservice to the people of this great state. Transfer Flow urges CARB to reconsider your platform and show reasonableness that your supporters can stand behind.

Sincerely,

Laurel Moorhead

Laurel Moorhead, E.I.T.
Regulatory Compliance Engineer