



November 16, 2023

Chair Lianne Randolph  
California Air Resources Board  
1001 "I" Street  
Sacramento, CA 95812  
Via 11-16-2023 Board Comments Docket

**Re: Zero Emission Motorcycles in the ARB Clean Transportation Programs Funding Plan 23-24**

Dear Chair Randolph and Members of the Air Resources Board:

Zero Motorcycles is a rapidly growing business that has created hundreds of green jobs in California over the last seventeen years. We make high performance zero emissions electric motorcycles which are extremely sought after and environmentally friendly. We need your assistance on driving forward California incentives for electric vehicles, specifically electric motorcycles.

Zero has shipped thousands of electric motorcycles to customers in California and across the entire world. We are second only to Tesla in terms of manufacturing electric vehicles in California. Over 100 police and public safety departments in California including LAPD, cities across the Central Valley, and our California Parks have deployed Zero motorcycles. And these motorcycles emotionally resonate with motorcycle riders, which is key to expansion of the market for zero emission vehicles.

We strongly support the ARB Staff efforts to include Zero Emission Motorcycles (ZEMs) in the Clean Cars 4 All and Financing Assistance programs as part of the overall Fiscal Year 2023-24 Funding Plan for Clean Transportation Incentives. The impact on the program is minimal from a cost standpoint and the signaling the market about the importance of this affordable vehicle class is critical as new models are being added at lower prices. Several electric motorcycle companies including ours are ramping volume shipments of these products, so this is the perfect time to expand these incentives and make them more available to underserved communities.

Highway capable Zero Emission Motorcycles can significantly impact ARB's goals to both reduce VMT and improve air quality. With an EPA UDDS range of over 200 miles and a top speed of 125 mph, our recently introduced MY2024 Zero motorcycles are all freeway capable and could serve more than 75% of California commuters. Hundreds of thousands of motorcycles are sold each year in California, often to replace cars for commuting. Doesn't it make sense to expand incentives on the most affordable type of zero emissions vehicle to those who need it the most?

# ZERO

## MOTORCYCLES®

In terms of air pollution these incentives become even more important as ARB considers regulations for motorcycle emissions reductions and expansion of ZEV programs to include electric motorcycles. ARB staff has recently stated that internal combustion motorcycles have become a significant source of mobile source emissions – especially criteria pollutants. Using ARB’s own EMFAC model, we determined that while internal combustion (ICE) motorcycles will have much smaller volumes and miles traveled (by factors of 27 and 127 respectively), they will combine to pollute 16% more than the total population of ICE cars. Cars have become so much cleaner while motorcycles now represent an ever expanding source of both on and off-road mobile emissions.

How can we help solve this problem? In two key ways – set standards to reduce emissions from ICE motorcycles in similar ways to how ARB has been successful with cars, and accelerate the shift to zero emissions motorcycle technology using appropriate incentives such as those in the CC4A and Financing Assistance programs.

Consumer incentives have proved extremely important in creating new markets. The State of California has ambitious goals for both air quality improvement and GHG reduction. Zero Motorcycles and other electric motorcycle manufacturers can make a meaningful contribution with the help of these incentives.

Please feel free to contact me if you have any questions and thank you again for all the great work you to improve our air quality.

Sincerely,



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