



January 11, 2024

California Air Resources Board
Sacramento, CA 95814

Re: Proposed Amendments to On-Road Motorcycle Emission Standards

Dear Chair Randolph and Board Members:

Coalition for Clean Air supports the Proposed Amendments to On-Road Motorcycle (ONMC) Emission Standards and urges you to adopt them. The ONMC Proposal will help to meet California's public health and climate targets, as well as State and federal air quality standards.

Historically, ONMCs accounted for a small fraction of all mobile source emissions in California. However, as emissions from other mobile sources decrease as a result of tighter emission standards and the increased prevalence of zero-emission vehicles (ZEVs), ONMC emissions make up a higher percentage of our emissions. Because California has not enacted new ONMC emissions standards since 1998, allowable emissions rates for ONMCs are significantly higher than other vehicle categories that are subject to more recent and stringent regulatory standards.

The amendments will significantly increase the prevalence of zero-emission motorcycles (ZEMs) in California, driving the sales of ZEMs to 50% in California by the 2035 model year. We believe a more ambitious ZEM standard is achievable, given the advances in battery technology and widespread availability of electricity.

ZEMs that have no tailpipe or evaporative emissions are a viable solution to several public health and environmental threats. ZEMs reduce mobile source emissions that contribute to unhealthy regional ozone and particulate matter levels, including local exposure to toxics. They reduce demand for petroleum production, delivery, and combustion that is destabilizing to the climate. Increasing the prevalence of new zero-emission ONMC sales will reduce harmful emissions and protect public health. By 2045, the proposal will result in an estimated 281,554 cumulative ZEMs sold statewide over baseline, and staff expects a reduction in cumulative GHG emissions by an estimated 0.58 million metric tons (MMT).

The proposal will also reduce emissions from remaining motorcycles that are powered by internal combustion engines by greatly harmonizing with European Union 5 (Euro 5) exhaust emissions standards, proposing more stringent evaporative emissions standards, and adopting additional on-board diagnostic (OBD) requirements beyond Euro 5. Manufacturers should have no trouble meeting these standards.

Monetized health benefits from the proposal outweigh costs by roughly 2-1. The cumulative total emissions reductions by 2045 are estimated to be 16,536 tons of ROG, 4,805 tons of NOx, and

Mr. Anthony Otto
December 8, 2014
Page 2 of 2

28 tons of fine particulate matter (PM_{2.5}) relative to the baseline, leading to an estimated 42 lives saved and other avoided hospital visits.

The need for these amendments is clear and compelling. California needs additional reductions of Reactive Organic Gas (ROG) and Oxides of Nitrogen (NO_x) to achieve ozone attainment. Mobile sources are the greatest contributor to emissions of criteria pollutants and GHG in California, accounting for about 80% of ozone precursor emissions and approximately 40% of statewide GHG emissions. CARB must act to achieve cost-effective emission reductions wherever possible.

If no action is taken, ROG and NO_x emissions from ONMCs are expected to reach levels near those of passenger cars. In 2020 ONMCs accounted for a disproportionately high 2.2% of all NO_x and ROG emitted from mobile sources in California while only accounting for 0.4% of vehicle miles traveled (VMT). As other vehicle categories continue to adopt more stringent emission controls, the proportion of emissions from ONMCs would continue to grow if no action were taken.

For all these reasons, we urge you to adopt the proposed amendments at your January 25 hearing.

Thank you for considering our views.

Respectfully,

A handwritten signature in cursive script that reads "Bill Magavern".

Bill Magavern
Policy Director