



7742 15th Ave. NE, Unit A
Seattle, WA 98115 T: (202) 220-1392
AmericanMotorcyclist.com

January 16, 2024

Mr. Robin Lang
Chief
Emissions Certification and Compliance Division
California Air Resources Board
1001 I St.
Sacramento, California 95814

RE: Proposed Amendments to On-Road Motorcycle Emission Standards and Test Procedures

On behalf of the more than 21,000 California members of the American Motorcyclist Association and the millions of other riders throughout the nation, we offer the following comments concerning the proposed amendments to on-road motorcycle emission standards and test procedures currently under consideration. However, this document shall not preclude any of our individual members, chartered clubs, or district organizations from submitting their own comments.

Founded in 1924, the AMA is the premier advocate of the motorcycling community. We represent the interests of millions of on- and off-highway motorcyclists. Our mission is to promote the motorcycling lifestyle and protect the future of motorcycling.

The AMA appreciates the ongoing public outreach by Air Resources staff during this rule-making process. We encourage staff members to continue to work with and identify constructive incentives for consumers and manufacturers to aid with costs associated with the pursuit, development and use of new technologies, rather than simply requiring specific equipment or techniques to attain any new requirements.

It is critical to note that while vehicle emissions are generally measured and considered on an individual, per mile basis, this proposal must consider the consequences the increased (or decreased) use of motorcycles would have on the entire vehicle emissions picture (the macro view if you will), and not just on the individual/micro level. The positive effect the use of motorcycles has on the fleet average speed, and therefore the overall emissions footprint, must be recognized and quantified as part of any new regulatory proposal.

Motorcycles use less raw materials to produce, are lighter, have a smaller footprint, better average MPG and significantly reduced impact on our aging transportation infrastructure. A recent study in Belgium (tmleuven.be/en/project/motorcyclesandcommuting) concluded that a modal shift towards motorcycles resulted in reduced traffic congestion for all road users. In fact, due to this small increase, overall average travel times were significantly shorter. In summary, the study determined that if 10% of all private cars were replaced by motorcycles, the total time loss due to congestion for all vehicles decreases by 40%. The study also reported that total emissions would be reduced significantly if 10% of private cars were replaced by motorcycles.

Likewise important, many popular models, like dual-sport and adventure bikes, are primarily used in rural areas, where range considerations can create additional safety concerns. Many of these areas are not facing the same air quality challenges as the more urbanized parts of the state, and as such any new regulations must recognize and make allowances for their continued availability.

Furthermore, California continues to be the epicenter of the nation and, quite possibly, the world, for countless motorcycle related businesses, manufacturers, and parts suppliers. Equally important, a myriad of businesses statewide offer the installation of accessories and service for these vehicles, and it is critical that any new rules governing the sale and use of on-road motorcycles and related accessories identify and address the real potential for significant economic and safety related consequences.

Similarly, the increasing availability of non-traditional Internal Combustion Engine (ICE) powered motorcycles, as well as recently announced hydrogen fueled and hybrid motorcycles, must be considered as part of an all-embracing approach to any new regulations. The sale of these bikes creates opportunities for fleet average programs, where manufacturers are credited for the sale of these low or zero emissions vehicles and allowed to offset emissions from more traditional ICE powered motorcycles.

To address these concerns, we again respectfully request the following issues are properly quantified, measured and acknowledged prior to any regulations being sent to the Air Resources Board for consideration:

- The proposed regulation change is not in direct harmony with the ECE requirements. This is problematic as the California vehicles will need to conform and to test to both standards, utilizing different fuels.
- The small volume manufacturer definition needs to remain as published in the current regulations and only apply to ICE/gas powered model sales when it comes to triggering the large manufacturer constraints and not include total vehicles.
- Any dual multi-level testing requirements will add significant cost and time to the California market certification process. The resulting effect of this non-harmony will likely be fewer models available in California, thus impacting local businesses.
- Any proposal to prohibit or limit in the near future, the sale of smaller displacement ICE vehicles would negatively impact retailers and potentially eliminate appropriately sized options for younger and novice riders, thus creating potential safety concerns. The requirement for electric only models in this category would create substantial new demand for already insufficient charging infrastructure, especially given the short range many of these vehicles would be capable of.
- Manufacturers, currently burdened with ECE compliance requirements, would be forced to create yet another similar, but not interchangeable set of reports for California certification, thus further limiting vehicle availability in a timely manner.
- The proposed mandated addition of OBD adds cost and complexity to the vehicles and adds a significant fee burden to motorcycle dealers and other repair locations, resulting in increased prices for maintenance and repairs to consumers. Diagnostic equipment costs are one consideration,

however the training of technicians on the use of diagnostic equipment places a severe on-going burden on businesses where retaining technical and administrative staff is very challenging.

- With the advanced monitoring systems potentially displaying vehicle fault codes, dealers and service locations will have the additional burden of diagnostic time, record keeping and warranty reporting to the manufacturers. Reimbursement time for warranty service claims places a burden upon the financial resources of independent businesses and adds significant responsibilities at the OEM level.
- CARB has not disclosed the projected emissions reduction from this proposal, nor have they identified the associated costs. It is very difficult to measure the effect of any new regulations without this critical information.
- The proposed regulation represents a significant ongoing economic hardship to businesses with unknown extensive costs to the citizens of California with minimal and non-disclosed environmental impacts.
- The average annual vehicle miles traveled by motorcycles pales in comparison to automobiles, and as such their contribution to overall emissions should reflect this reality and not be exaggerated to justify onerous and costly restrictions.

Thank you in advance for considering our comments on behalf of our California membership and riders everywhere. We remain optimistic that a mutually acceptable solution can be identified and welcome the opportunity to continue a dialog with staff and other interested stakeholders.

Sincerely,

A handwritten signature in dark ink, appearing to read "Nick Haris", written in a cursive style.

Nicholas Haris
Director of Government Relations