

National Coalition of Motorcyclists

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January 16, 2024

California Air Resources Board
1927 13th St.
Sacramento, CA 95811

Re: Proposed Amendments to On-Road Motorcycle Emission Standards and Test Procedures and Adoption of New On-Board Diagnostic and Zero-Emission Motorcycle Requirements

Members of the California Air Resources Board.

On behalf of the National Coalition of Motorcyclists (NCOM), thank you for the opportunity to comment on the proposed on-road motorcycle (ONMC) regulatory amendments. We recognize the impact that decisions made by the California Air Resources Board have on all Americans, not just the citizens of California and the CARB member states.

NCOM was formed in 1986 when motorcycle groups and leaders from around the nation met to provide a powerful unified voice to stand up for the rights of bikers everywhere. NCOM is more than just a single organization; it is comprised of numerous motorcycle rights groups, clubs, and associations, all working together for the greater good of the biker community.

Motorcycles are a unique and key component of our transportation system. Increased fuel prices and congestion have seen Americans continue to turn to motorcycles as a reliable, fuel efficient and affordable means of transportation. According to the Insurance Institute for Highway Safety, in 2021 there were over 900,000 registered on-road motorcycles in the state of California. A number double that of 2002.

This increase in motorcycle ownership clearly demonstrates that consumers see the advantages motorcycles provide in our complex transportation ecosystem. However, proposed changes to emissions standards and a push for 50% of new ONMC be zero emission motorcycles (ZEM) by 2035 will not meet the needs of consumers. As the CARB report states, riders strongly prefer the range, performance, and aesthetic characteristics of internal combustion engines (ICE) and motorcyclists will be reluctant to adopt ZEM alternatives. While there is no doubt a small set of consumers will seek out ZEMs.

Aside from personal preference, there remains much skepticism about the physical infrastructure surrounding the push towards ZEM. There are dramatic differences between the parts, components and needs of passenger vehicles as compared to motorcycles. The fact that ONMC were not originally included in the proposed push to electric vehicles underscores that a one size fits all approach towards electrification of our transportation system does not make sense. This

is reflected in Harley Davidsons guidance in their third quarter guidance to investors. The guidance stated that LiveWire (the Electric Harley Davidson motorcycle) unit sales would be 600-1000 and an operating loss of \$115 to \$125 million. The LiveWire has been in production since 2019.

Ford Motor Company “e” dealers have installed charging stations on their lots to expand the charging network and help alleviate the “range anxiety.” Yet Ford has cut production on the F-150 Lightning and Mustang MachE. This further demonstrates the resistance to change in the transportation market.

We also believe that a focus strictly on emissions is misguided and ignores negative repercussions of the push for ZEM. What about the Non-Tailpipe Emissions? The manufacture, maintenance, the impact on the infrastructure due to increased weight and disposal of these vehicles at the end of usable life.

Sourcing the critical minerals needed to power ZEM is also problematic. The consulting group Benchmark Mineral Intelligence estimated that China controlled 58 percent of the global production of lithium compounds in 2022, 69 percent of nickel sulfate, 69 percent of synthetic graphite, 75 percent of cobalt, 95 percent of manganese and 100 percent of spherical graphite. Creating a system that turns over the source of a core part of ZEM production to authoritarian governments, with unsafe labor practices and human rights abuses is upsetting. What is China’s record for not only emissions into the atmosphere, but impact on soil and water extracting and processing these minerals?

Disposal of these vehicles at end of life is very worrisome. The batteries needed to power are difficult to recycle and contain materials that are harmful to our soil and ground water if accidental contamination occurs.

The motorcycling community is not limited to just riders. The support system around motorcycling includes both OEM and aftermarket parts dealers and service centers, who have for over 100 years provided the parts and maintenance. The ability to work on one’s motorcycles, repair, and rebuild it is a critical part of motorcycling. A shift towards ZEM will destroy that unique part of our lifestyle and a historic part of American culture. It will also cause unknown economic damage to the hundreds of small businesses across the state that service and maintain the nearly over 900,000 motorcycles on California roads.

Our concerns about the push for ZEM are not without merit. Since 1986 NCOM and its members organizations have traveled the country meeting, talking, and learning from bikers. We understand the American street rider, and fear that a push to ZEM will destroy a vibrant and distinctively American lifestyle. Forcing consumers to purchase a product they don’t want, and

will not use, is not an effective public policy. Allowing the market to freely dictate the products available to consumers will result in the best outcomes for all those involved.

A handwritten signature in black ink, appearing to read 'Ed Schetter', with a long horizontal flourish extending to the right.

Ed Schetter
Chairman
Legislative Task Force
National Coalition of Motorcyclists.