



January 16, 2024

Chair Liane Randolph and
Members of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Support w/ Amendments - On-Road Motorcycle Emission Standards and Test Procedures

Dear Chair Randolph and Members of the Board:

Earthjustice appreciates the opportunity to comment on the Proposed Amendments to On-Road Motorcycle (motorcycles) Emission Standards and Test Procedures. The proposed amendments will provide emission reductions necessary for California to meet the federal and state air quality standards. The proposal, however, would require far fewer emission reductions than are technologically feasible. We encourage the California Air Resources Board (CARB) to set more ambitious zero-emission motorcycle (ZEM) sales targets, which will play an important role as we transition towards a zero-emission future.

CARB last amended its motorcycle standards in 1998.¹ It is essential for California to protect communities from the toxins released by motorcycles, given that the technology has advanced significantly since the late 1990s. A stronger ONMC rule is vital because tens of millions of Californians live in air basins that breathe the most polluted air in the country. Ratcheting down on motorcycles is another critical segment in CARB's long list of equipment that must transition to zero-emissions. The proposal would allow motorcycles to continue to pollute even as other vehicles become fully zero-emissions. Cars and trucks will be 100 percent zero-emission vehicles by 2035 and 2036, respectively, while motorcycles will only reach 50 percent in a similar timeframe.

The current proposal has significant room for improvement. CARB should adopt ZEM sales targets that align with current global trends. A recent study projects that the global sale of electric motorcycles will double by 2030.² In Asia alone, sales of electric motorcycles are estimated to, at minimum, triple by 2030.³ The United Kingdom's recent transportation plan commits to phasing

¹ CARB on Road Motorcycle (ONMC) Rulemaking Public Workshop (June 2023), available at https://ww2.arb.ca.gov/sites/default/files/2023-06/ONMC%20Workshop_060723.pdf

² BBC, "Will electric motorbike sales take off across Asia?" (June 2022), available at <https://www.bbc.com/news/business-61907734>

³ Ibid.

out all new non-zero emission motorcycles and scooters by 2035.⁴ China, responsible for 53 percent of global two-wheeler sales in 2021, sold 39 million two-wheelers, 70 percent of which were electric.⁵ Growing consumer interest and demand in electric two-wheelers is propelling the number of manufacturers entering the electric market and increasing the number of options for consumers globally.⁶ CARB’s motorcycle regulation has an overly conservative 50 percent target of ZEM by 2035 instead of the 100 percent target proposed by the recent draft of CARB’s 2020 mobile source strategy.⁷ Moreover, given that tens of millions of electric motorcycles are sold each year globally, the 2028 and interim year targets could also be strengthened. Earthjustice encourages CARB to, at minimum, consider a review of ZEM sales targets well in advance of 2030 to allow for more ambition in this rule.

Overall, Earthjustice supports CARB’s efforts to push ZEMs, and we hope the agency will set targets that are more in line with the current state of technology.

Thank you for considering our comments.

Respectfully,
Vanessa Rivas Villanueva
Adrian Martinez
Earthjustice

⁴ Department for Transport, Decarbonising Transport – A Better Greener Britain, at p. 94 (July 2021), available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1009448/decarbonising-transport-a-better-greener-britain.pdf

⁵ BloombergNEF, “Two-Wheelers on a Steeper Path to Zero Emissions by 2050,” (June 2022), available at <https://about.bnef.com/blog/two-wheelers-on-a-steeper-path-to-zero-emissions-by-2050/>

⁶ McKinsey & Company, “The real global EV buzz comes on two wheels,” (August 2023), available at <https://www.mckinsey.com/industries/automotive-and-assembly/our-insights/the-real-global-ev-buzz-comes-on-two-wheels>

⁷ CARB, Zero-Emission Motorcycles, available at <https://ww2.arb.ca.gov/zero-emission-motorcycles>