

Motorcycle Riders Foundation

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*"The only national motorcyclists' rights organization
dedicated to on-street riders"*



October 25, 2024

California Air Resources Board
1927 13th Street
Sacramento, CA 95811

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

Dear Members of the California Air Resources Board,

On behalf of the Motorcycle Riders Foundation (MRF), thank you for the opportunity to resubmit comments regarding the proposed on-road motorcycle (ONMC) regulatory amendments. We recognize the far-reaching impact that decisions by the California Air Resources Board have on all Americans, not just those who reside in the Golden State. We appreciate that you have reviewed previous comments from January of this year and adjusted some of your framework to account for the nearly 10-month delay in holding this hearing. However, we remain steadfast in our belief that policies which attempt to restrict consumer choice and fabricate a marketplace for certain vehicles is unwise.

The MRF provides leadership at the federal level for state motorcyclists' rights organizations as well as motorcycle clubs and individual riders. The MRF is chiefly concerned with issues at the national and international levels that impact the freedom and safety of American street motorcyclists. The MRF is committed to being a national advocate for the advancement of motorcycling and its associated lifestyle and works in conjunction with its partners to help educate elected officials and policymakers in Washington and beyond. As such, the MRF and its network of over 250,000 motorcyclists are pleased to offer the following comments.

Motorcycles are a unique and key component of our transportation system. Facing rising fuel prices and increased congestion, 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 952,977 registered on-road motorcycles in the State of California. That number is more than double the 409,170 registered in 2002.¹

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 to be zero emission motorcycles (ZEM) by the mid 2030's will not meet the needs of consumers. As the CARB report states, riders strongly prefer the range, performance, and aesthetic characteristics of internal combustion

¹ <https://www.iihs.org/api/datastoredocument/bibliography/2225>

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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, the vast majority of riders have chosen and continue to choose motorcycles with ICE.

Mandates that force motorcyclists to buy new ZEM might in fact push them away from the new motorcycle market. Motorcyclists would instead seek the purchase of used bikes or extend the life of their current biker. The average age of motorcycles on the road would increase and the resulting emissions from them would have an effect that is opposite goal of this plan.

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.

As this new technology is deployed, concepts like adding a reduced speed mode, present major safety concerns for motorcyclists. In the rush to electrify our transportation network, we hope that the safety of all road users is taken into account.

We also believe that a focus strictly on emissions is misguided and ignores negative repercussions of the push for ZEM. Increased weight of these vehicles will no doubt increase the impact on infrastructure and require increased maintenance. Disposal of these vehicles at end of life is very worrisome. The batteries needed to power them contain materials that are harmful to our soil and ground water.

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.

The motorcycling community is not limited to just riders. The support system around motorcycling includes aftermarket parts dealers, who have for over 100 years provided the parts and expertise to repair and improve bikes. The ability to work on one's motorcycles, customize, 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 1 million motorcycles on California roads.

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Our concerns about the push for ZEM are not without merit. For nearly 40 years the MRF and its members has traveled the country meeting, talking, and learning from bikers from coast to coast. We understand the mindset of 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 determine the products available to consumers will result in the best outcomes for all parties involved.

Kirk Willard
President, Chairman of the Board
Motorcycle Riders Foundation