



South Coast Air Quality Management District

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*Office of the Executive Officer
Barry R. Wallerstein, D.Env.
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January 20, 2009

Mr. James Goldstene
Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Dear Mr. Goldstene:

James

SCAQMD Staff Comments on
California Air Resources Board Proposed Evaluation Procedures
for Aftermarket Critical Emission Control Parts on Highway Motorcycles

The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to provide its support for the California Air Resources Board (CARB) staff proposed evaluation procedures for aftermarket critical emission control parts on highway motorcycles. Without the proposed evaluation procedures, there would be no exemption process for part manufacturers who wish to develop aftermarket parts that do not degrade emissions. This would result in continued illegal use and sale of aftermarket parts that increase emissions, such as aftermarket exhaust systems that do not contain catalytic converters.

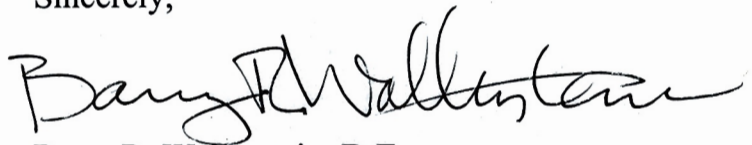
CARB has made important strides towards reducing emissions from new highway motorcycles through the adoption of more stringent emission standards that became effective in 2004, and tighter standards that became applicable in 2008. However, there will be a shortfall of actual emission reductions from these measures if the illegal use and sale of aftermarket parts is not addressed. As identified by CARB, the Motorcycle Industry Council has estimated that 38 percent of all highway motorcycles surveyed in 2003 had exhaust and/or muffler modifications. Due to this high level of tampering, the proposed evaluation procedures are critical to prevent backsliding of emission reductions.

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Additionally, we urge CARB to move forward to include highway motorcycles in California's Smog Check Program, as incorporated in the 2007 State Implementation Plan. Without such actions, there will be no practical check on illegal tampering, and the benefits from the more stringent emission standards for highway motorcycles would be greatly compromised. We understand that legislative action will be required to incorporate motorcycles in California's Smog Check Program and encourage CARB to seek such legislation.

In conclusion, the South Coast AQMD staff supports the proposed regulation and we urge the CARB Board to adopt the regulation at its January 22, 2009 meeting. If you have any questions regarding our comments, please feel free to call me or Mr. Henry Hogo, Assistant Deputy Executive Officer - Mobile Source Division, Science and Technology Advancement, at 909-396-3184.

Sincerely,

A handwritten signature in black ink, appearing to read "Barry R. Wallerstein". The signature is fluid and cursive, with the first name "Barry" and last name "Wallerstein" clearly distinguishable.

Barry R. Wallerstein, D.Env
Executive Officer

CSL:HH:DKS:DRC:LB