



October 28, 2024

Liane Randolph, Chair  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**Subject: Support for On-Road Motorcycle proposal**

Dear Chair Randolph and Members of the Board:

On behalf of the American Lung Association, we write to provide comments in support of the On-Road Motorcycle regulations and urge the board to adopt the proposed rule amendments. California motorcycle standards have not been updated since 1998. This sector must be held to more health-protective standards, just as other on-road vehicles have been over the past quarter-century in pursuit of attainment of clean air standards and community protection.

Californians face the most difficult air pollution challenges in the nation, with over 90 percent living in communities impacted by ozone and/or particle pollution according to the American Lung Association's "State of the Air" 2024 report. Breathing these pollutants can create a wide range of health emergencies, including asthma attacks, heart attacks, stroke, lung cancer and premature deaths. It is well known that communities nearest major sources of traffic pollution (often communities of color, and lower-income communities) face increased risk of these health impacts, the onset of asthma and other health risks and premature death due to cardiovascular, lung cancer and other causes.

Curbing harmful emissions from the transportation sector – including the on-road motorcycle sector – is critical to achieving federal health-protective clean air standards and state climate requirements. The proposed amendments offer a practical pathway to ensuring new, on-road motorcycles are cleaner and less polluting in the real world. As noted, these standards are overdue in light of the significant improvements made in larger vehicle classes since motorcycle standards were last updated in 1998:

*"If no action is taken, ROG and NOx emissions from this category are expected to reach levels near those of passenger cars. In 2020 ONMCs accounted for a disproportionately high 2.2% of all NOx and ROG emitted from mobile sources in California while only accounting for 0.4% of vehicle miles traveled (VMT). As other vehicle categories continue to adopt more stringent emission controls, the proportion of emissions from ONMCs would continue to grow if no action is taken."<sup>1</sup>*

The key components of the policy proposals follow the development and growing deployment of cleaner technologies and align with standards proven beyond California. Critically, the proposals reflect CARB's awareness of the ongoing need for in-use assurances that any equipment certified for use in California is not (intentionally or unintentionally) malfunctioning and causing greater levels of pollution than expected. The Lung Association supports this program to:

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<sup>1</sup> CARB, On-Road Motorcycle Standards. Initial Statement of Reasons. at p. 1.  
<https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2024/onmc/isor.pdf>

- Align California emission standards with those already in place in European markets starting in 2029, reflecting that the technologies are widespread and operational in practice.
- Require new engines to incorporate on-board diagnostics to ensure that real-world operations are performing as expected under certification.
- Begin zero-emission requirements for new motorcycle sales from 10% in 2028 to a minimum of 50% by 2035, per the 2022 State Implementation Plan for Ozone.<sup>2</sup>

Unfortunately, the nearly year-long delay in taking this item to the board since the initially scheduled January 2024 meeting has cost a year of deployment of cleaner vehicles, leading to the potential for additional pre-buy ahead of requirements. This is of course concerning from a health and clean air perspective as the rule is projected to save over 40 lives and generate \$564 million in health benefits, more than double the projected compliance costs.<sup>3</sup> Therefore, we urge the board to act without further delay to ensure the long-overdue transition to cleaner motorcycles in California becomes a reality.

Thank you for considering our comments, and for your ongoing work in support of meeting health-protective air quality standards. Please contact Will Barrett at [William.Barrett@Lung.org](mailto:William.Barrett@Lung.org) with any questions or for more information.

Sincerely,

Will Barrett  
Senior Director, Nationwide Advocacy  
Clean Air

Mariela Ruacho  
Senior Manager, California Advocacy  
Clean Air

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<sup>2</sup> CARB. 2022 State Implementation Plan for Ozone at p.67. September 2022.  
[https://ww2.arb.ca.gov/sites/default/files/2022-08/2022\\_State\\_SIP\\_Strategy.pdf](https://ww2.arb.ca.gov/sites/default/files/2022-08/2022_State_SIP_Strategy.pdf)

<sup>3</sup> CARB. ONMC ISOR at p. 72.