

**Comment 1 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 45 Day.**

First Name: Dwayne

Last Name: Prickett

Email Address: dnjprickett@roadrunner.com

Affiliation:

Subject: On Road motorcycle emissions discussion

Comment:

Please stop, yes stop...

The number of miles ridden by motorcycles is so minimal compared to the effort required and inconvenience to motorcyclists to implement such a program. The overall benefit is outweighed by the time and cost to the public.

Just seems to be another way for CARB to expand their already bloated sphere of control.

Dwayne

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-06 07:54:59

No Duplicates.

## **Comment 2 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 45 Day.**

First Name: Tony

Last Name: Carreon

Email Address: tony\_carreon@hotmail.com

Affiliation:

Subject: Comment Submission for Proposed ONMC Emission Standards

Comment:

Subject: Comment Submission for Proposed ONMC Emission Standards Amendments

Dear California Air Resources Board,

I hope this message finds you well. As an avid motorcycle enthusiast and a member of the American Motorcyclist Association, I would like to express my thoughts on the proposed amendments to the On-Road Motorcycle (ONMC) emission standards and test procedures.

I understand the importance of environmental regulations to mitigate pollution and protect our air quality. However, it is crucial to strike a balance between emission reduction goals and the preservation of the unique characteristics that make motorcycles a distinct mode of transportation and recreation.

While I support efforts to reduce emissions and promote cleaner technologies, I urge the Board to consider the practical implications for motorcycle enthusiasts. Striking a fair compromise between environmental concerns and the freedom and joy that motorcycling brings to many is essential. As you review the proposed amendments, please take into account the following considerations:

**Technological Feasibility:** Ensure that the proposed emission standards are technologically feasible for motorcycle manufacturers, especially smaller ones, to implement without compromising the performance and affordability of motorcycles.

**Consumer Impact:** Consider the potential impact on consumers, including the availability and affordability (cost increases especially in today's economy) of motorcycles. Balancing emission reduction goals with the economic realities of motorcycle enthusiasts is vital to maintaining a thriving community.

**Safety and Performance:** Maintain a focus on safety and performance in any regulatory changes. Motorcycles are unique vehicles, and any modifications should not compromise their handling, acceleration, or braking capabilities.

**Incentives for Innovation:** Encourage and incentivize innovation in cleaner motorcycle technologies. Providing support for research and development can lead to advancements that benefit both the environment and the motorcycle community.

As a member of the American Motorcyclist Association, I believe that a collaborative approach, involving input from motorcycle enthusiasts and industry experts, can result in regulations that achieve environmental goals while preserving the essence of motorcycling.

Thank you for your dedication to environmental stewardship, and I appreciate the opportunity to contribute to this important discussion.

Sincerely,

Tony Carreon

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-06 07:56:29

No Duplicates.

**Comment 3 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 45 Day.**

First Name: Andrew

Last Name: Bajka

Email Address: andy2020@bajka.com

Affiliation:

Subject: Proposed Amendments to On-Road Motorcycle Emission Standards and Test Procedures

Comment:

Please stop this nonsense.

Motorcycles are only responsible for approximately 0.82% of all vehicle miles driven in California. This estimate is very conservative and the actual number is likely to be far less.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-06 09:01:51

No Duplicates.

**Comment 4 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 45 Day.**

First Name: THOMAS

Last Name: GRAY

Email Address: skionic@yahoo.com

Affiliation:

Subject: Money grab?

Comment:

With so few motorcycles on the road, this reads like a money grab than anything else.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-06 10:43:33

No Duplicates.

## **Comment 5 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 45 Day.**

First Name: Robert

Last Name: Otten

Email Address: bear4jc59@gmail.com

Affiliation:

Subject: Proposed amendment to ONMC emission standards

Comment:

Dear California Air Resources Board,

As an avid motorcycle and Powersports enthusiast and owner I would like to express my thoughts on the proposed amendments to the On-Road Motorcycle (ONMC) emission standards and test procedures.

I understand the importance of environmental regulations to mitigate pollution and protect our air quality. However, it is crucial to strike a balance between emission reduction goals and the preservation of the unique characteristics that make motorcycles a distinct mode of transportation and recreation.

While I support efforts to reduce emissions and promote cleaner technologies, I urge the Board to consider the practical implications for motorcycle enthusiasts. Striking a fair compromise

between environmental concerns and the freedom and joy that motorcycling brings to many is essential. As you review the proposed amendments, please take into account the following considerations:

**Technological Feasibility:** Ensure that the proposed emission standards are technologically feasible for motorcycle manufacturers, especially smaller ones, to implement without compromising the performance and affordability of motorcycles.

**Consumer Impact:** Consider the potential impact on consumers, including the availability and affordability (cost increases especially in todays economy) of motorcycles. Balancing emission reduction goals with the economic realities of motorcycle enthusiasts is vital to maintaining a thriving community.

**Safety and Performance:** Maintain a focus on safety and performance in any regulatory changes. Motorcycles are unique vehicles, and any modifications should not compromise their handling, acceleration, or braking capabilities.

**Incentives for Innovation:** Encourage and incentivize innovation in cleaner motorcycle technologies. Providing support for research and development can lead to advancements that benefit both the environment and the motorcycle community.

As do others in the motorcycling community I believe

that a collaborative approach, involving input from motorcycle enthusiasts and industry experts, can result in regulations that achieve environmental goals while preserving the essence of motorcycling.

Thank you for your dedication to environmental stewardship, and I appreciate the opportunity to contribute to this important discussion.

Respectfully,

Robert D. Otten

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-06 11:00:26

No Duplicates.

**Comment 6 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 45 Day.**

First Name: Justin

Last Name: McDonald

Email Address: jmcdonald@aes123.com

Affiliation:

Subject: Apose this action

Comment:

I apose any new regulations and do not approve any changes.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-06 19:59:11

No Duplicates.

**Comment 7 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 45 Day.**

First Name: Michael

Last Name: Omodt

Email Address: [motorcyclemike@gmail.com](mailto:motorcyclemike@gmail.com)

Affiliation:

Subject: ONMC24

Comment:

The emissions testing and on-board diagnostics are a complete waste of time and money given the zero-emission motorcycle requirement by 2035. Please do not support this amendment.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-07 08:06:30

No Duplicates.

## **Comment 8 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 45 Day.**

First Name: Michael

Last Name: Soberanes

Email Address: [mightslip@sbcglobal.net](mailto:mightslip@sbcglobal.net)

Affiliation:

Subject: Motorcycle and fossil fuel use

Comment:

I have PV panels, and an EV motorcycle, because I care about not using oil as far as practical, and also because of the performance advantages. But to eliminate or even regulate them further is just a waste of time. ( Motorcycles are responsible for just 0.82 or less of all vehicle driven miles in California ) What I think is the enormous CARB empire needs to be shrunk down to about 10% at least.

The divide between rich and poor is being dramatically exacerbated by these single-issue-driven policies and that will severely impact one minor group of folks to no effect whatsoever.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-08 08:40:43

No Duplicates.

## **Comment 9 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 45 Day.**

First Name: Eric

Last Name: Olson

Email Address: sockwalker99@yahoo.com

Affiliation:

Subject: ONMC24, Proposed motorcycle emissions reg's

Comment:

Hello California bureaucrats!

Open your eyes as you drive down California's streets and highways and please understand that motorcycles represent a tiny fraction of the total number of vehicles on the road, and are only responsible for a gnats ass worth of pollution and overall emissions. The proposed ONMC24 regulations are typical bloated and wasteful government overreach, which will do virtually nothing to save the planet.

Please stop with the ridiculous rules and regulations already.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-09 06:58:22

No Duplicates.

**Comment 10 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 45 Day.**

First Name: thomas

Last Name: larson

Email Address: [tommylarson55@roadrunner.com](mailto:tommylarson55@roadrunner.com)

Affiliation:

Subject: onmc24

Comment:

please do not adopt this new tax on CA residents that ride  
motorcycles

we all ready suffer with worse roads in the western states and now  
you want tax and inconvenience the motorcycle community even more  
our impact on the emissions environment is so small  
you will be adding the reasons that residents will to leave CA

thanks for your consideration

Tom Larson

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-09 07:40:45

No Duplicates.

## **Comment 11 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 45 Day.**

First Name: Curt

Last Name: McDowell

Email Address: biker@fishlet.com

Affiliation:

Subject: Motorcycle emissions

Comment:

I have an EV car and PV panels, and an EV motorcycle too, because I care about not using oil as far as practical, and also because of the performance advantages. I think the enormous CARB empire needs to be shrunk down to 10% at least. Banning gas powered generators is a stupid and dangerous idea, as is banning natural gas, as we need redundant energy sources if we're not to freeze and starve by thousands and millions, particularly those not living in cities, to be prepared for extended electrical outages. Doing no nuclear research for decades was unconscionable, and we're screwed for that. Solar and wind aren't an answer -- we can't rely on them, can't store the energy, and can't use it all when oversaturated (if we are to believe PG&E who uses this as an excuse to pay \$0.02, half wholesale for electricity they sell for \$0.48). Lugging tons of batteries around town is a supremely stupid idea, while plugin hybrids should be the goal. The new Prius Prime goes 50 miles on a charge with a battery 20% the size of a BEV, and for most people never needs gas, but it can also go 500 miles on gas when necessary. The divide between rich and poor is being dramatically exacerbated by these single-issue-driven policies. Moreover, global warming is a pretty dumb thing to worry about when AI is on the verge of dramatically changing our existence and by 2100 "humans" won't be anything like we are now. Messing with motorcyclists is another stupid and useless idea in the scheme of things, as it will severely impact one minor group of folks to no measurable effect whatsoever. Electric motorcycles have very low range and it has barely improved since I got mine 7 years ago, since batteries are subject to physical and chemical limitations. Batteries remind me of when governments mandated compact fluorescent bulbs, which severely underperform and contain poisonous compounds. The market should determine where we go, not legislation that sounds good on the surface.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-09 13:21:13

No Duplicates.

## **Comment 12 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 45 Day.**

First Name: David

Last Name: Ambrose

Email Address: rvsquadron@protonmail.com

Affiliation:

Subject: Motorcycles are already the solution

Comment:

As an aerospace engineer I can assure you there is so much flawed data in the proposal it would take me months to respond to it all. My 5 gas powered motorcycles achieve 45-50 mpg and most motorcycles are ridden as a hobby during good weather. Their emissions are lower than the emission required to make the batteries in all-electric motorcycles. Li ion batteries, hydrogen, and SAF are many decades from being created "green", if ever. Stop the lies and deception, pass a law that requires an analysis of all the embedded energy and its method (and source) of production. This legislation out-sources work to China, the most prolific violator of the environment. This legislation adds stress to an energy grid in CA that can't tolerate it. This proposal forces me to use a product I don't want to use, this is tyranny. This proposal forces me to accept a lower quality of life. This proposal adds to the already excessive burden of living in CA - high property taxes, high elect bill, high gas bill, high water bill, high crime, high state taxes, excessive regulation everywhere, high insurance rates... The proposal must me considered with the many other CA policies that deter from a good quality of life. Everyone single person I know in CA is leaving or has a plan to leave. I have a plan to leave and this proposal just accelerated my plan. I intend to move to a free state (Texas, Florida, S. Dakota...) and take my large salary with me. This policy will have no impact on the environment and only detract from an already poor quality of life. You are eliminating the middle class in CA, you'll be left with Silicon Valley, Hollywood, and a whole lot of Mexicans. CA has been on a path of self destruction and it's honestly probably better to accelerate that destruction, then maybe others can come in and fix it. Going electric is the same as the CFL lightbulb trap, but there's nobody honest in government to admit that.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-12 09:49:10

No Duplicates.

## **Comment 13 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 45 Day.**

First Name: Robert

Last Name: Mills

Email Address: robert.mills882@gmail.com

Affiliation: Certificate Consultant to Norton

Subject: Small Volume Provisions

Comment:

Within the series of documents released on November 28th 2023 are allowances for small volume manufacturers to continue using the present test procedures and limit values that have existed for several years. That is until a threshold of 300 units per model year is exceeded, thus rendering them as regular volume manufacturers.

In the document relating to OBD are further details as to the requirements and expectations that will apply as a small volume manufacturer transitions to regular volume status. The details therein give a small volume manufacturer greater lead time and business confidence to make the necessary changes and ensures that a supplier with the technology and expertise to help achieve the new (Euro5+) requirements can be sourced. For various reasons, not least the low volumes of parts sold, such suppliers typically decline to work with small volume manufacturers making the task very difficult indeed.

However, in the documents relating to tailpipe and evaporative emissions, no such transitory provisions are present for small volume manufacturers. As currently written, they would mean a hard and immediate transition to regular volume status and thus would mean an immediate requirement to comply with the Euro5+ standards proposed.

Given that the exceedance of the 300 unit figure could be a temporary one in a single or one-off model year, the three model year average seen in the OBD document affords a small volume manufacturer both lead-time and business confidence to commit to the extensive changes and additional costs needed. It should be noted that the technological aspects of the Euro5+ standard are inextricably linked, especially in software/calibration terms, and so a soft transition in only one area of the regulation is of dubious benefit. It is requested therefore that the very clear and sensible small volume provisions in the OBD document are also applied to tailpipe and evaporative emission requirements.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-13 06:09:39

No Duplicates.

**Comment 14 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 45 Day.**

First Name: Daniel

Last Name: Alameda

Email Address: bdalameda@earthlink.net

Affiliation:

Subject: Motorcycle Emissions Amendment

Comment:

Please do not change the present emission standards and methods for motorcycles. All this will do is add cost to consumers and benefit no one or improve anything. It is time for California to reduce regulations for individuals not increase them. I am already overwhelmed by the state of California's regulations and requirements and even though I was born and raised in this state, I find that I am fast approaching the day when I will have to leave this state due to the way the State has overburdened the citizens of California.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-12-25 21:46:13

No Duplicates.

## **Comment 15 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 45 Day.**

First Name: Kevin

Last Name: Smith

Email Address: sjkls8@gmail.com

Affiliation:

Subject: Opposition to ONMC emission standards updates

Comment:

Hello,

I encourage the Board to delay implementation of these proposed changes for a period of not less than 10 years.

The potential costs to existing and future motorcycle owners are downplayed in this analysis but will be significant on an individual level. Moving ahead with these changes will result in riders being forced to change to larger four-wheeled ICE vehicles and to import non-conforming vehicles from other states. Both changes will decrease revenues to the State and will not result in the proposed air quality improvements.

Further, small businesses will be directly affected by these proposed changes, resulting in job losses and less availability of service, sales, promotions and advice to motorcycle riders and owners. At a minimum these changes will require riders and owners to travel further for such services, creating higher VMT and increased emissions.

The State of California is facing dramatic budget shortfalls in the time periods within the proposal. These proposals will result in lower tax revenues and directly-increased costs to the Government. Our tax dollars will be better served by focusing Government actions upon markets which create vastly greater emissions and pollutants than the ONMC market could ever impact.

Kevin Smith  
Member, American Motorcyclist Association

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-01-03 19:24:46

No Duplicates.

## **Comment 16 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 45 Day.**

First Name: Dale

Last Name: Gretzinger

Email Address: dfslsg@pacbell.net

Affiliation:

Subject: ONMC24

Comment:

I encourage the Board to delay implementation of these proposed changes until a viable electric motorcycle market is achieved.

The potential costs to existing and future motorcycle owners are downplayed in this analysis but will be significant on an individual level. These changes will result in riders being forced to go to four-wheeled ICE vehicles and the State and will not see any proposed air quality improvements.

The small business community will be directly affected by these proposed changes, resulting in job losses and less availability of service, sales, promotions and advice to motorcycle riders and owners.

The State of California is currently facing a dramatic budget shortfall. These proposals will result in lower tax revenues and directly-increased costs to the Government. Our tax dollars will be better served by focusing Government actions upon markets which create vastly greater emissions and pollutants than the ONMC market could ever impact.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-01-08 16:29:20

No Duplicates.

## **Comment 17 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 45 Day.**

First Name: Bryce

Last Name: H

Email Address: bryceh79@gmail.com

Affiliation: Back Country Motorcycle Tours

Subject: EV motorcycles lack range for touring

Comment:

Please do not eliminate ICE engines for motorcycles until an EV-Motorcycle can match the range of a basic EV-Car with a fast recharge time. Current and near future EV-Motorcycles are not there yet. EV motorcycles lack the range of EV cars due to a significantly smaller battery capacity which makes road trips and tours on an EV-Motorcycle into the back country impossible. An EV car battery is often in the 60-80 kWh while a motorcycle has a battery of 18 kWh or less on only the most expensive EV motorcycles. This is why its common for an EV car to have a 200+ mile range while an EV-Motorcycle gets only 100 miles and often much less than that. Motorcycles are not ridden strictly for commuting, these are adventure machines that the majority of riders use to explore twisty and exciting back country roads and locations. Locations that often either do not have any charge points or not enough to recharge the bikes of a large touring group going through the back country of Hwy 395, Hwy 1, or Hwy 36. An EV-Motorcycle just does not have the range to make such a trip and if part of a riding group (very common) there wont be enough chargers to go around to every EV-Motorcycle.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-01-08 17:11:21

No Duplicates.

## **Comment 18 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 45 Day.**

First Name: Carlos

Last Name: Tavares

Email Address: ctavares75@comcast.net

Affiliation:

Subject: Proposed Amendments to On-Road Motorcycle Emission Standards and Test Procedures

Comment:

Hello,

Zero emission or EV motorcycles are not a viable solution and frankly makes no sense. Already a motorcycle's range can be a challenge for trips where gas stations are not available for long stretches.

As a current owner of an EV and having made long trips (NorCal to SoCal), it's already a challenge to make the drive given EV limited range, lack of density / availability of charging infrastructure, unreliable charging infrastructure, quantity high speed charging stations available. We're talking a vehicle that has a 131 kilowatt battery. A motorcycle's battery would be a teeny fraction of that thus the range would also be a fraction of what a gas motorcycle can achieve today. Which again can be a challenge already.

There is room for EV motorcycles and we have some already in the market today. For those who are using them in city riding that is short distance and doesn't require normal to long range, this is a suitable alternative. It's a niche application though and not one that can be relied upon to replace gas motorcycles.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-01-08 18:17:52

No Duplicates.

## **Comment 19 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 45 Day.**

First Name: Michael  
Last Name: McClintic  
Email Address: michael88mc-nospam@yahoo.com  
Affiliation:

Subject: Mandate for EV motorcycles is not feasible

Comment:

Hello,

My response to goverment mandated electric vehicle usage and ICE sales restrictions:

1. An economic solution not a legal solution should be explored. Once the economics and convience of electric vehicles becomes a reality people will naturally switch over from ICE vehicles.
2. Motorcycles are unique in that their range is limited because the batteries don't yet have the power density. Even ICE motorcycles usually require re-fueling every 100-150 miles. Gasoline is also a relatively easy and power-dense source of energy and if necessary can be transported in containers or easily shared among several motorcycles.
3. Motorcycling often involves touring the backroads where you are lucky to even find a gas station, let alone a charging station. Imagine a group of 5 or more motor-cyclists touring the back country and all need a re-fueling. Even if luck enough to find an EV charger, getting all the motorcycles re-charged in a timely fashion is not realistic.

Making financially available, promoting more R&D on battery technology, and encouraging usage of electric powered motorcycles for urban and commuting use cases makes sense.

Banning ICE motorycycles and "hoping" the technology and infrastructure catch-up is not good goverment.

Link on lack of Electric Power infrastructure preparedness:

<https://www.powersystems.technology/news/us-news/nerc-report-warns-of-impending-electricity-shortages-in-north-america-by-2024.html#:~:text=The%20report%20indicates%20that%20over,electrification%20of%20buildings%20and%20vehicles>

Please give this more consideration and approach this important topic from a financial incentive approach vs. a regulatory legal ban.

Thanks for your consideration  
...Michael McClintic

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-01-11 11:16:04

No Duplicates.

**Comment 20 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 45 Day.**

First Name: Bill

Last Name: Magavern

Email Address: bill@ccair.org

Affiliation: Coalition for Clean Air

Subject: CCA support for motorcycle rule

Comment:

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/21-onmc24-B2QAZVExBQkAZQlm.pdf>'

Original File Name: CCA comments on Proposed Amendments to On-Road Motorcycle Emission Standards.pdf

Date and Time Comment Was Submitted: 2024-01-11 15:58:31

No Duplicates.

**Comment 21 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 45 Day.**

First Name: Brian  
Last Name: Silovich  
Email Address: brian.silovich@livewire.com  
Affiliation: LiveWire EV, LLC.

Subject: Comment Submission for Proposed ONMC Regulation Order  
Comment:

Dear California Air Resources Board,

I hope this message finds you well. On behalf of LiveWire, an electric motorcycle manufacturer, we would like to express our thoughts on the proposed amendments to the Appendix A On-Road Motorcycle Standards and Test Procedures and Adoption of New On-Board Diagnostics and Zero-Emission Motorcycle Requirements. Please see the attached listed of comments.

On behalf of LiveWire. we appreciate the opportunity to contribute to this discussion.

Sincerely,

Brian Silovich  
LiveWire EV, LLC.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/22-onmc24-Am4GaVEmU2VVJFI7.pdf>'

Original File Name: LiveWire Comments\_Proposed Regulatory Order\_ONMC-OBD-ZEM.pdf

Date and Time Comment Was Submitted: 2024-01-12 05:20:55

No Duplicates.

## **Comment 22 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 45 Day.**

First Name: Jean-Michel  
Last Name: Desaulniers  
Email Address: [jean-michel.desaulniers@brp.com](mailto:jean-michel.desaulniers@brp.com)  
Affiliation: Bombardier Recreational Products Inc.

Subject: Proposed Amendments to the On-Road Motorcycle Regulation

Comment:

Technical comments on regulatory documents:

Appendix A:

- Page 10 paragraph 13 CCR 1958(i): The requirement to provide all the items listed in (A), (B) and (C) represents an unnecessary burden as some of the information is not relevant to environmental performance and some information is not applicable to the US market. Also; it is not a simple copy/paste of a type approval as California HMC will be significantly different from the European HMC mainly due to the difference in evaporative requirements; the California HMC most likely won't be type approved in Europe. Sections 0.2, 0.3, 0.4.2, 0.5, whole section B from 0.7 to 0.11.2 and 0.13 are not applicable to the US Market. The whole section 2 contains a lot more information than required only for an emission regulation. The relevant information should continue to be the information required in the current CARB application format and information currently requested in the EV-CIS CSI.7 template.

Appendix B1:

- Page 9 paragraph C.12.2: Same comments than for 13 CCR 1958(i)  
- Page 11 paragraph 8.3: The service accumulation option 4 is allowing bench aging durability testing. No proposed regulatory text seems to describe any IUVIP "In Use Verification Program" if option 4 is selected. IUVIP must be clear and described in the regulatory text if required. The only area where IUVIP seems to be mentioned is in the Economic Analysis Appendix C.  
- Page 13 paragraph D. 17: Not clear what is the CARB certification test fuel to be used. The paragraph seems to lead toward a CARB LEV IV certification test fuel. Several HMC manufacturers are currently certifying off-road recreational vehicles and/or marine products which are tested with CARB LEV III certification test fuel. It will be an additional burden for laboratories and manufacturers to keep two sets of certification test fuel. The difference between the CARB LEV IV and CARB LEV III remains in a specification "13-15 vol. % Multi-substituted Alkyl Aromatic Hydrocarbons" for CARB LEV III versus "5.2-6.4 vol. % C7 Aromatics (toluene)" for CARB LEV IV. There is not enough time for understanding the impact of this difference on the tailpipe emissions for all engine technologies covered by HMC, OFRV and Marine. If the impact on HMC is marginal: the CARB certification test fuel should be CARB LEV III or CARB LEV IV.

Appendix B-2:

- Page 2 paragraph 1.1.5.1: No comment only if it is made clear that there is no tip test for three-wheels HMC.  
- Page 2 paragraph 1.4: Same comments than for Appendix B1 Page 13

paragraph D. 17. Additionally; the RVP is the same between CARB LEV III and CARB LEV IV, it is theoretically expected to have no or negligible impact on evaporative emission.

- Page 6 paragraph 4: This part of the sentence "unless each evaporative emissions-related parts has undergone equivalent durability testing for exhaust" should be clarified for each exhaust durability options:

->1 "Per US EPA 86.426-78 which is half of useful life with 4 exhaust emission test and first test at 3,500km for Class III",

->2 "Full mileage accumulation per EU 134/2014, Annex VI, section 3.1"

->3 "Partial mileage accumulation per EU 134/2014, Annex VI, section 3.2"

->4 "Bench aging durability test per EU 134/2014, Annex VI, section 3.6, Appendix 3 to Annex VI, and Appendix 4 to Annex VI"

- Page 6 paragraph 4: Because the TP-901 is a procedure only for fuel tanks; the sentence "The evaporative emissions control system must satisfy..." should be replaced by "The fuel tank must satisfy...".

- Page 6 and 7 paragraph 4 combined with Figure 2 of page 8: This whole section is confusing. It should be clear what must be performed. The following example is not the only confusing point: The Figure 2 shows a path if full mileage is performed that goes directly to the Section 4.3 and 4.4 but there is this sentence "A vehicle that has completed the full useful life service accumulation with the evaporative components installed throughout the duration of service accumulation may be exempt from the vibration durability requirements (Section 4.1.1), whichever are applicable": where this sentence seems to still request Section 4.1.2 which seems to be in conflict with Figure 2. Also; the section 4.1.1 is about thermal cycling and section 4.1.2 is about vibration. The whole section 4 should be improved for clarity.

- Page 10 paragraph 4.3: It is understood that three-wheels HMCs are more stable and less likely to tip over as opposed to HMCs having two wheels. For clarity; it should be added that the tip test does not apply to three-wheel HMCs.

- Page 25 and 26 paragraph 10.2.1: Clarity should be improved since it refers to "150 cycles of load with a mixture of 50 percent gasoline (or butane) vapor/air" but then the term "fuel exposure" is used. Does the fuel exposure is the exposure to the "50 percent gasoline (or butane) vapor/air"? A proposal would be to replace this sentence "The initial BWC should be established before fuel exposure of between 10 and 100 BWC cycles and the final BWC should be established after 150 cycles of fuel exposure by performing not more than 10 BWC cycles" by this sentence "The initial BWC should be established before the 50 percent gasoline (or butane) vapor/air mixture exposure of between 10 and 100 BWC cycles and the final BWC should be established after 150 cycles of the 50 percent gasoline (or butane) vapor/air mixture exposure by performing not more than 10 BWC cycles".

#### Appendix C:

- The end of page 22 and beginning of page 23 refers to an "In Use Verification Program (IUPV)" for manufacturers selecting the catalyst bench aging. The "IUPV" requirement should be described and made clear in the Appendix B1. Comment linked with the comment on Appendix B1 Page 2 paragraph 1.4

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-01-15 03:55:58

No Duplicates.

## **Comment 23 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 45 Day.**

First Name: Alan

Last Name: Sloan

Email Address: Mightyalan125@gmail.com

Affiliation:

Subject: On road motorcycle emissions

Comment:

Dear California Air Resources Board,

As an avid motorcycle enthusiast and owner I would like to express my thoughts on the proposed amendments to the On-Road Motorcycle (ONMC) emission standards and test procedures.

I understand the importance of environmental regulations to mitigate pollution and protect our air quality. However, it is crucial to strike a balance between emission reduction goals and the preservation of the unique characteristics that make motorcycles a distinct mode of transportation and recreation.

While I support efforts to reduce emissions and promote cleaner technologies, I urge the Board to consider the practical implications for motorcycle enthusiasts. Striking a fair compromise

between environmental concerns and the freedom and joy that motorcycling brings to many is essential. As you review the proposed amendments, please take into account the following considerations:

**Technological Feasibility:** Ensure that the proposed emission standards are technologically feasible for motorcycle manufacturers, especially smaller ones, to implement without compromising the performance and affordability of motorcycles.

**Consumer Impact:** Consider the potential impact on consumers, including the availability and affordability (cost increases especially in today's economy) of motorcycles. Balancing emission reduction goals with the economic realities of motorcycle enthusiasts is vital to maintaining a thriving community.

**Safety and Performance:** Maintain a focus on safety and performance in any regulatory changes. Motorcycles are unique vehicles, and any modifications should not compromise their handling, acceleration, or braking capabilities.

**Incentives for Innovation:** Encourage and incentivize innovation in cleaner motorcycle technologies. Providing support for research and development can lead to advancements that benefit both the environment and the motorcycle community.

As do others in the motorcycling community I believe that a collaborative approach, involving input from motorcycle enthusiasts and industry experts, can result in regulations that achieve environmental goals while preserving the essence of motorcycling.

Thank you for your dedication to environmental stewardship, and I appreciate the opportunity to contribute to this important discussion.

Respectfully,

Alan

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-01-15 11:20:42

No Duplicates.

**Comment 24 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 45 Day.**

First Name: Robert

Last Name: Alsip

Email Address: robert.alsip@suz.com

Affiliation:

Subject: Comments by Suzuki Motor USA, LLC

Comment:

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/25-onmc24-VDdROFc7UW9VNIA+.pdf>'

Original File Name: Comments by Suzuki Motor USA LLC.pdf

Date and Time Comment Was Submitted: 2024-01-15 14:38:10

No Duplicates.

**Comment 25 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 45 Day.**

First Name: Rasto

Last Name: Brezny

Email Address: [rbrezny@meca.org](mailto:rbrezny@meca.org)

Affiliation: MECA Clean Mobility

Subject: Proposed Amendments to the On-Road Motorcycle Emission Standards

Comment:

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/26-onmc24-Uj9XNFEzUWNQCVIx.pdf>'

Original File Name: MECA\_comments\_CARB\_ORMC\_Proposal\_011524 FINAL.pdf

Date and Time Comment Was Submitted: 2024-01-15 18:19:24

No Duplicates.

**Comment 26 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 45 Day.**

First Name: Nicholas

Last Name: Haris

Email Address: nharis@ama-cycle.org

Affiliation:

Subject: Proposed Amendments to On-Road Motorcycle Emission Standards and Test Procedures&#8239;

Comment:

Please see attached file.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/27-onmc24-UTJdNFA8WGZQM1Q6.pdf>'

Original File Name: Comments on test procedure proposal.pdf

Date and Time Comment Was Submitted: 2024-01-16 11:37:44

No Duplicates.

**Comment 27 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 45 Day.**

First Name: Leslie  
Last Name: Slavik  
Email Address: [leslie.slavik@harley-davidson.com](mailto:leslie.slavik@harley-davidson.com)  
Affiliation: Harley-Davidson Motor Company

Subject: Proposed Amendments to On-Road Motorcycle Emission Standards and Test Procedures  
Comment:

See Attachment

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/28-onmc24-UDhUNl0xUGAEXQdh.pdf>'

Original File Name: HDMC Formal Comment\_ONMC\_Jan 2024.pdf

Date and Time Comment Was Submitted: 2024-01-16 12:11:44

No Duplicates.

**Comment 28 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 45 Day.**

First Name: Kirk

Last Name: Willard

Email Address: wfox@hbstrategies.us

Affiliation: Motorcycle Riders Foundation

Subject: On-Road Motorcycle Emission Standards

Comment:

See attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/29-onmc24-BjQCNAMwBGNWDwBj.pdf>'

Original File Name: 2024 CARB Public Comments MRF.pdf

Date and Time Comment Was Submitted: 2024-01-16 12:54:38

No Duplicates.

**Comment 29 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 45 Day.**

First Name: Dane  
Last Name: Hoechst  
Email Address: dane.hoechst@polaris.com  
Affiliation: Polaris Inc.

Subject: Comments and Proposed Changes to Proposed ONMC Regulation Order  
Comment:

Dear California Air Resources Board,

Polaris Inc. (Polaris), on behalf of Polaris and Indian Motorcycle Company, respectfully submits these comments regarding the recently released proposed regulation order "Proposed Amendments to On-Road Motorcycle Emission Standards and Test Procedures and Adoption of New On-Board Diagnostics and Zero-Emission Motorcycle Requirements".

Sincerely,

Dane Hoechst  
Sr. Manager, Regulatory Affairs  
Polaris Inc.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/30-onmc24-UWNQYIRIWDoGMQA2.pdf>'

Original File Name: 240116\_Polaris Comments on CARB ONMC Final Regulatory Proposal.pdf

Date and Time Comment Was Submitted: 2024-01-16 14:52:24

No Duplicates.

**Comment 30 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 45 Day.**

First Name: Ed

Last Name: Schetter

Email Address: [enjoyingtheride1@aol.com](mailto:enjoyingtheride1@aol.com)

Affiliation: National Coalition of Motorcyclists

Subject: Proposed Amendments to On-Road Motorcycle Emission Standards and Test Procedures and Adopt

Comment:

Thank you for the opportunity to comment.

Ed Schetter  
National Coalition of Motorcyclists

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/31-onmc24-WyldPgFzUnFXPgZo.pdf>'

Original File Name: response01162024.pdf

Date and Time Comment Was Submitted: 2024-01-16 15:05:35

No Duplicates.

**Comment 31 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 45 Day.**

First Name: Eric

Last Name: Barnes

Email Address: [ebarnes@mic.org](mailto:ebarnes@mic.org)

Affiliation: Motorcycle Industry Council

Subject: MIC Comments on CARB's Proposed Requirements For On-Highway Motorcycles

Comment:

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/32-onmc24-VWVVYl1tVTAKPgAw.pdf>'

Original File Name: 01162024 MIC Comments CARB Proposed HMC Regulation.pdf

Date and Time Comment Was Submitted: 2024-01-16 15:39:34

No Duplicates.

**Comment 32 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 45 Day.**

First Name: Russ

Last Name: Brenan

Email Address: russel.brenan@kmc-usa.com

Affiliation:

Subject: ONMC Regulatory Proposal Comments

Comment:

Please see attachment.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/33-onmc24-UDsFYIEnBzUBdFAx.pdf>'

Original File Name: Kawasaki January 2024 CARB HMC Board Hearing Comments.pdf

Date and Time Comment Was Submitted: 2024-01-16 15:47:09

No Duplicates.

**Comment 33 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 45 Day.**

First Name: Vanessa  
Last Name: Rivas Villanueva  
Email Address: [rvrivasvillanueva@earthjustice.org](mailto:rvrivasvillanueva@earthjustice.org)  
Affiliation: Earthjustice

Subject: Comments on Proposed Amendments to ONMC Standards

Comment:

Dear California Air Resources Board,

On behalf of Earthjustice, we appreciate the opportunity to comment on the Proposed Amendments to On-Road Motorcycle Standards and Test Procedures. Please see the attached document with our comments.

Sincerely,

Vanessa Rivas Villanueva  
Adrian Martinez  
Earthjustice

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/34-onmc24-VjNTNFUmACdXOQJo.pdf>'

Original File Name: Earthjustice ONMC Emission Standards and Test Procedures  
Comments\_Final Letter.pdf

Date and Time Comment Was Submitted: 2024-01-16 16:42:43

No Duplicates.

**Comment 34 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 45 Day.**

First Name: Matthew  
Last Name: Johnson  
Email Address: Matthew\_K\_Johnson@na.honda.com  
Affiliation: American Honda Motor Co., Inc.

Subject: ONMC Rulemaking Comments

Comment:

Please see attached documents.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/35-onmc24-UztUPQRrU2RSNVAP.zip>'

Original File Name: Honda Comments CARB ONMC Rulemaking\_20240116.zip

Date and Time Comment Was Submitted: 2024-01-16 17:01:58

No Duplicates.

## **Comment 35 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 45 Day.**

First Name: Michael

Last Name: DiPiero

Email Address: Ministryman@comcast.net

Affiliation: ABATE of CA./ UMVCC.

Subject: On road Motorcycle

Comment:

While ONMC's may produce slightly higher portions of greenhouse gases per unit, they do not have the same life expectancy or the same mileage expectancy as conventional vehicles.

Mobile sources are inclusive of much more than just ONMC's, in fact ONMC's are the smaller portion of Mobile sources, yet you are crediting them with the higher proportional value. Portable construction equipment has longer run times in localized areas leading to more localized health issues than ONMC's which are here and gone in a short period of time leaving behind much less residue. When you look at health issues such as Asthma or Respiratory Disease, they are generally viewed from a regional source. ONMC's travel over greater areas which does not cause localized concentrations. Therefore your use of the data is skewed. It is possible to produce cleaner fuels, and vehicles that are more efficient without forcing people to go to electric vehicles which are not as reliable or as economically viable as stated or promoted.

Yes, of course there would be a revenue gain for the state as electricity is more costly than gasoline, therefore more taxes to be collected and of course this is the real goal. With no cost to school districts which do not use ONMC's. However; the cost to the public would be far greater than the few partly dollars forecast by whatever number you picked out of the air. (Perhaps you should try it first and see what the real cost is). (in the loss of jobs, shops, parts and services. Then in the replacement cost compared to those now. Especially if delivery vehicles are also electric and have to stop every couple hundred miles and charge for 12 hours. Lets try to look at the whole picture here. Then there's the costs of permits and installation of charging systems at homes etc. Short sightedness does not equate to less or no cost. Right now because of the weather electric vehicles all over the country are failing. People are waiting 16 hours or more to try and charge their vehicles. To say the cost will balance out in ten years is just being naive as most electric vehicle only last ten years; and that's if they are not involved in any kind of minor accident.

Again there is no Infrastructure for electric vehicles of any kind in California. We cannot support the needs we currently have for electricity as it is.

How discriminatory is it to force electric vehicles; ONMC's on the public and let the CHP BE EXEMPT and I'm sure any other law enforcement agency that asks.

The cost to life savings is Paltry. To GUESS that 42 lives might be saved at the cost of billions of dollars and the freedom of

millions of legal citizens is a poor excuse for trampling on peoples constitutional rights and disenfranchising the peoples of California.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-01-16 17:00:33

No Duplicates.

**Comment 36 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 45 Day.**

First Name: John

Last Name: Paliwoda

Email Address: info@camda.net

Affiliation: CMDA

Subject: Amendments to On-Road Motorcycle Emission Standards ...

Comment:

Please see attachment for the California Motorcycle Dealers Association's Comments

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/37-onmc24-UTIGbQFkBzVRCAV3.pdf>'

Original File Name: CMDA Response To CARB RE - ONMC & ZEM Proposed REgs.pdf

Date and Time Comment Was Submitted: 2024-01-16 23:03:54

No Duplicates.

**There are no comments posted to Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) that were presented during the Board Hearing at this time.**

## **Comment 1 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 15-1.**

First Name: Doug

Last Name: Broussard

Email Address: fourx5@gmail.com

Affiliation: Rider and user of California roads.

Subject: Vanishing returns

Comment:

As the CARB embraces EVs and continues to punish users of post-1976 classic cars and motorcycles, I find myself wondering whether this rule along board is prepared to show the road user financial impact for paying more to purchase a motorcycle that requires the additional expense and weight of OBD equipment.

Diminishing returns that require substantial expense, engineering work, and visiting a Smog check center are not worth the taxpayer expense. We all want cleaner air, and I support the initial mission of the CARB, but over the past tenets years, I've watched the board take punitive and performative actions that substantially damage California Taxpayers and road users. Misinformation and expense are the primary results for road users; requiring this additional expense and road use simply to verify compliance is a bad idea for all of us.

Like the PUC,

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-22 11:14:00

No Duplicates.

**Comment 2 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 15-1.**

First Name: Mark

Last Name: Nadolski

Email Address: Mark\_nadolski@yahoo.com

Affiliation:

Subject: Stop wasting time and money

Comment:

Motorcycle emissions are very small compared to overall emissions. The rest of the world gets on just fine without these requirements.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-23 07:30:27

No Duplicates.

**Comment 3 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 15-1.**

First Name: Robert

Last Name: Alsip

Email Address: robert.alsip@suz.com

Affiliation: Suzuki Motor USA, LLC

Subject: Comments to ONMC Proposed 15-day Modifications

Comment:

Please see attached document.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/44-onmc24-AGMAaQFtBTtSMQZo.pdf>

Original File Name: Comments by Suzuki Motor USA, LLC.pdf

Date and Time Comment Was Submitted: 2024-10-24 10:06:46

No Duplicates.

**Comment 4 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 15-1.**

First Name: Michele

Last Name: Riggs

Email Address: Shelleyriggs@outlook.com

Affiliation:

Subject: Motorcycle Emissions

Comment:

I strongly oppose this and any new regulations and do not approve any changes.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-24 16:36:54

No Duplicates.

**Comment 5 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 15-1.**

First Name: Nate

Last Name: Anderson

Email Address: nate.a.anderson2@gmail.com

Affiliation:

Subject: I oppose all

Comment:

I oppose any and all regulations proposed or otherwise concerning On-Road Motorcycle Emission Standards and Test Procedures and Adoption of New On-Board Diagnostics and Zero Emission Motorcycle Requirements.

I oppose all these regulations because it will impose an undue burden on the general public. It will increase manufacturing costs, repair costs, maintenance costs and operational costs which will all be passed on to the consumer.

Please remove all these and any like regulations affecting motorcycles. I do not agree with this type of over-regulation by the government and I do not support this.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-24 19:41:00

No Duplicates.

**Comment 6 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 15-1.**

First Name: Haven

Last Name: donaldson

Email Address: hlmdonaldson@gmail.com

Affiliation:

Subject: STOP RAISING GAS PRICES

Comment:

I am a california native and am disgusted with the state I love and live In. So making it impossible to live here. Lower our gas prices so we can survive. The push for climate change needs to be put in the hands of corporations using tons of big oil to produce plastic trash that pollutes our planet. That's the reason issue here. Take their money and give them stipulations on fossil fuels. Not the average everyday American. Shame on you all.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-25 09:58:57

No Duplicates.

**Comment 7 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 15-1.**

First Name: Kirk

Last Name: Willard

Email Address: wfox@hbstrategies.us

Affiliation: Motorcycle Riders Foundation

Subject: On-Road Motorcycle Emission Standards

Comment:

See attachment

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/48-onmc24-WzZRJVYxVFgAK1UK.pdf>

Original File Name: MRF - CARB Updated Comments October .pdf

Date and Time Comment Was Submitted: 2024-10-28 07:50:57

No Duplicates.

**Comment 8 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 15-1.**

First Name: Leslie  
Last Name: Slavik  
Email Address: leslie.slavik@harley-davidson.com  
Affiliation: Harley-Davidson Motor Company

Subject: Comments to ONMC Proposed 15-day Modifications

Comment:

Please see Attachment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/49-onmc24-AWIWNFwwV2dRCFA2.pdf>

Original File Name: HDMC Formal Comment\_ONMC\_Oct 2024.pdf

Date and Time Comment Was Submitted: 2024-10-28 11:20:31

No Duplicates.

**Comment 9 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 15-1.**

First Name: Eric

Last Name: Barnes

Email Address: ebarnes@mic.org

Affiliation:

Subject: Comments on CARB's Proposed Regulation for On-Highway Motorcycles

Comment:

Hello,

Please see the attached comments on CARB's proposed regulation for on-highway motorcycles.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/50-onmc24-WmsANgc0AmUGMgg4.pdf>

Original File Name: 10242024 CARB HMC Regulation Comments.pdf

Date and Time Comment Was Submitted: 2024-10-28 11:27:09

No Duplicates.

**Comment 10 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 15-1.**

First Name: Nicholas

Last Name: Haris

Email Address: nharis@ama-cycle.org

Affiliation: American Motorcyclist Association

Subject: Comments on proposed amendments to on-road motorcycle emissions standards

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/51-onmc24-BmUGYVwvBzZQCQIz.pdf>

Original File Name: CARB 10282024 comments.docx.pdf

Date and Time Comment Was Submitted: 2024-10-28 13:35:46

No Duplicates.

## **Comment 11 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 15-1.**

First Name: Brian  
Last Name: Silovich  
Email Address: brian.silovich@livewire.com  
Affiliation: LiveWire EV, LLC.

Subject: Comment Submission for Modified Proposed ONMC Regulation Order  
Comment:

Dear California Air Resources Board,

I hope this message finds you well. On behalf of LiveWire, an electric motorcycle manufacturer, we would like to express our thoughts on the modified proposed amendments to the Appendix A On-Road Motorcycle Standards and Test Procedures and Adoption of New On-Board Diagnostics and Zero-Emission Motorcycle Requirements. Please see the attached listed of comments.

On behalf of LiveWire. we appreciate the opportunity to contribute to this discussion.

Sincerely,

Brian Silovich  
LiveWire EV, LLC.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/52-onmc24-UDxQPwZxBTMGd1M6.pdf>

Original File Name: LiveWire Comments\_Modified Proposed Regulatory Order\_ONMC-OBD-ZEM.pdf

Date and Time Comment Was Submitted: 2024-10-28 13:10:14

No Duplicates.

**Comment 12 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 15-1.**

First Name: Kevin

Last Name: Brown

Email Address: [kbrown@meca.org](mailto:kbrown@meca.org)

Affiliation: MECA Clean Mobility

Subject: MECA Comment on Proposed Motorcycle Standards

Comment:

please find our comments attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/53-onmc24-VzpWNVMxADJRCANg.pdf>

Original File Name: MECA\_comments\_CARB\_ONMC\_Proposal\_281024.pdf

Date and Time Comment Was Submitted: 2024-10-28 15:38:01

No Duplicates.

**Comment 13 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 15-1.**

First Name: Will

Last Name: Barrett

Email Address: william.barrett@lung.org

Affiliation: American Lung Association

Subject: Support for ONMC amendments

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/54-onmc24-UD8BaVE9BDQFXAZq.pdf>

Original File Name: ONMC Lung Assn Support 10.28.24.pdf

Date and Time Comment Was Submitted: 2024-10-28 16:46:01

No Duplicates.

**Comment 14 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 15-1.**

First Name: Matthew  
Last Name: Johnson  
Email Address: Matthew\_K\_Johnson@na.honda.com  
Affiliation: American Honda Motor Co., Inc.

Subject: CARB ONMC Rulemaking 15-day Comments

Comment:

Please see attached document.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/56-onmc24-AGgAaQNsAjUKbQlW.pdf>

Original File Name: Honda Comments CARB ONMC Rulemaking\_20241028.pdf

Date and Time Comment Was Submitted: 2024-10-28 19:40:46

No Duplicates.

**Comment 15 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 15-1.**

First Name: Mark

Last Name: Nadolski

Email Address: Mark\_nadolski@yahoo.com

Affiliation:

Subject: Motorcycle emissions

Comment:

This law is extremely wasteful. The cost is exorbitant for the emissions reduction. Motorcycles are too energy intensive per unit mass for electric batteries to work effectively at this time or in the near future.

Don't do this, it makes no sense!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-28 20:31:13

2 Duplicates.

**Comment 16 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 15-1.**

First Name: John

Last Name: Paliwoda, CMDA

Email Address: info@camda.net

Affiliation: CMDA – California Motorcycle Dealers Ass

Subject: CARB's Proposed ONMC and ZEM Regulation (onmc24)

Comment:

Please review the attached CMDA comments regarding CARB's proposed ONMC and ZEM regulation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/60-onmc24-WjlTOARhBzUEXVI+.pdf>

Original File Name: CMDA Ltr to CARB Clerk of the Board – ONMC Reg 10:28:24.pdf

Date and Time Comment Was Submitted: 2024-10-28 20:39:34

No Duplicates.

**Comment 17 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 15-1.**

First Name: Jay

Last Name: Friedland

Email Address: jay@zeromotorcycles.com

Affiliation: Zero Motorcycles, Inc.

Subject: Support for Zero Emission Motorcycles in ONMC regulations

Comment:

Please see Zero Motorcycles' comments in the attached file.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/62-onmc24-VjdSJlAzVihSOwVr.pdf>

Original File Name: ARB-ONMC-15day-ZeroMotorcycles-2024-10-28.pdf

Date and Time Comment Was Submitted: 2024-10-28 22:41:56

1 Duplicates.

**Comment 18 for Amendments to On-Road Motorcycle Emission Standards and Test Procedures (onmc24) - 15-1.**

First Name: Vanessa

Last Name: Rivas Villanueva

Email Address: [vrvillanueva@earthjustice.org](mailto:vrvillanueva@earthjustice.org)

Affiliation: Earth Justice

Subject: Earthjustice Comments on Modified Text for Proposed Amendments to ONMC

Comment:

Comment received for ONMC2024 Docket.

Comment received within 15-Day comment period and resubmitted by Clerk on commenter's behalf.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/22-fundingplan2024-UTRRNIEiUHcCbFI4.pdf>

Original File Name: Earthjustice ONMC Emission Standards and Test Procedures Modification Comments\_102824.pdf

Date and Time Comment Was Submitted: 2024-10-29 10:06:41

No Duplicates.