California Motorcycle Dealers Association
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Since 1971 — Over Thirty Years of Service to California's Motorcycle & Motorsport Dealers

July 19, 2006
Robert F. Sawyer, Ph.D., Chairman
California Air Resources Board
1001 I Street
Sacramento, CA 95814

06-7-4
July 20, 2006

Re: Comments for the July 20, 2006 Public Hearing to Consider Amendments to the California Regulations for new 1997 and later Off Highway Recreational Vehicles and Engines

Dear Chairman Sawyer:

The California Motorcycle Dealers Association (CMDA) is the 35-year old non-profit trade association for California motorcycle and motorsport dealers. We count a majority of the state's franchised dealers and many motorcycle and motorsport-related businesses as CMDA Members.

In 1998, the CMDA was instrumental in promoting the establishment of a program that would allow the use of non-CARB certified off-highway motorcycles and ATVs in areas of the state where, and during times of the year when, their arguably small amount of emissions would not severely impact the ambient smog level. That evolved into the "red-sticker" program.

When the OHRV riding areas and seasons were established in 1998 the CMDA felt that because of the emissions monitoring stations being, very often, long distances from OHV use areas, the riding seasons were often too short because of inconclusive data.

We are pleased that the current rulemaking is, for the most part, opening up the riding seasons for established areas, and even creating new areas, often with unlimited OHV usage. I have reviewed the emission monitoring station locations, and am pleasantly surprised to see that an additional 19 net monitoring sites have been added since 1998. This increases the accuracy of establishing appropriate riding seasons that obviously support your staff's recommendations for extending the red sticker riding use areas and times. CARB's methodogy has improved much since 1998 and it is difficult to criticize the results.

We are very gratified to see that two State Vehicle Recreation Areas (SVRAs) have been granted year-round use status. We would like to see all of the SVRAs open year-round for red sticker vehicle use, because it has become increasingly difficult for off-highway vehicles to find legal, or appropriate, places that provide for off-road motorized recreation. At least, if all of the SVRAs were open year-round, that would provide more opportunity for regulated OHV sites, cutting down on illegal OHV use on private property and public land, thereby contributing to already smog impacted areas.

Two SVRAs, in particular, come to mind when considering year-round red sticker use. The CARB staff recommendation for Clay Pit, near Oroville, leaves it off limits for non-CARB certified OHVs for only two months, July and August. Please consider assigning Clay Pit year-round usage.

Hungry Valley, the second largest SVRA, is located in the Tejon Pass, where rural Los Angeles county meets similarly rural Kern County. There are no local emission monitoring devices; the only significant pollution generator is the narrow band of the 5 Freeway. The elevation is 3,000 feet, so the emissions generated by OHVs is even above the inversion layer, resulting in little, or no, smog buildup. We respectfully request that the Hungry Valley SVRA be reclassified for year-round red sticker use instead of only the seven months that it now can be used.

The CMDA urges you, and the other Air Resource Board Members, to vote for the staff recommendations, and to consider the above suggestions proposed by the CMDA. Thank you.

Respectfully,

John Paliwoda,
Executive Director of the CMDA

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