



DISTRICT 36 MOTORCYCLE SPORTS COMMITTEE, INC.

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January 29, 2014

Via Electronic Submission / USPS

CLERK OF THE BOARD
AIR RESOURCES BOARD
1001 "I" STREET
SACRAMENTO, CA
95814

RE: SUBMITTAL OF COMMENTS 15 DAY NOTICE

MODIFICATIONS TO THE PROPOSED ADOPTION OF EVAPORATIVE EMISSION CONTROL REQUIREMENTS FOR OFF-HIGHWAY RECREATIONAL VEHICLES

Dear Chairwoman Nichols and ARB Project Staff,

District 36 Motorcycle Sports Committee [D36], a 59 year old non-profit organization, submits comments pertaining to the issue identified above, and speaks on behalf of its membership. Members of D36 retain the right to supplant these comments as individual members of D36.

Regulations that are proposed relating to the enthusiasts that enjoy legal and responsible Off-Highway Vehicle [OHV] recreation, and the OHV industry itself have concerns about the proposed regulations, the science supporting said regulations, and the financial impact it will have upon consumers at the point of sale, as well as financial impact upon manufacturers and industry long term.

D36 agrees that air quality is an issue of concern, the advancement in technology appears to be addressing major issues almost on a daily basis.

History has shown these improvements since the beginning of CARB as an agency, and reasonable and unreasonable regulations have been imposed, and unfortunately most of the regulations have cause increased economic duress and increased cost to the consumer, and is well known that when CARB creates a regulation that increase the cost of a vehicle, reality is shown as that cost increase is ultimately borne by the consumer in increased purchase cost. Please understand I am not trying to appear nasty, but that is the reality. CARB acknowledges that their regulation will impose a higher cost to the end user. This is not good for the economy as it struggles to dig itself out of this National, California and Regional economic situation. Also of note, and increased cost base will also increase the amount of California mandated sales taxes related to a consumer purchase.

Based upon comments made at the December CARB meeting, open the public, include Motorcycle Industry Council representatives that indicated the power sports industry they represent will make effort for compliance as needed. But concern remains that certain models MAY not be available to Californian's, and be regulated to 49 state only models. This is a big concern for our members.....

Model elimination for California residents, specifically youth oriented and appropriated youth sized vehicles is of concern, as current law does NOT allow them to operate larger vehicles, thus hurting the opportunity for responsible recreation operation by youth, as well as industry suffering from loss of sales of these vehicles. California business will be forced to adapt to this, which could cause economic harm from lost sales, employee lay off situations due to lost income from service and product sales such as riding gear and maintenance items needed for the long term operation of these recreation vehicles.

Within documents and discussions, it appears that potential sales increases, or sales recovery in the OHV field of motorcycles, ATV's, and other OHV recreation types - the growth assumption is just that, an assumption.



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We would expect/suggest a lateral modification to implementation of these regulations to adjust in a timely manner conducive to a sliding scale of date implementation based up unit sales recovery if the projections and assumptions fail to meet what CARB has proposed.

In regards to #2416. Applicability

(B) [1,2,3,4] A separate section needs to be identified as it is not clear as listed in (4) because of incomplete Designation to identify Cal Code Regs, Tit. 13 2412(f) because it is CCR 13, Chapter 9, Article 3, 2412 Emission Standards and Test Procedures, which outlines Test Procedures and Emission Standards.

(f) Off-Road motorcycles and ATV's, and engines used in such vehicles, do not meet emission standards in subsection (B).

I believe to the layman this means Red Sticker Restrictions.

Concerning 2418. Evaporative Emission Standards and Test Procedures, as outlined in (d) is a complex issue, in which most of the public could not understand as presented.

We believe more SCIENCE is needed here, especially in light of 4 stroke technology advancements, and minimal output of emissions BASED upon what appears to be a street legal mandate of emissions.

We would ask you to EXTEND the comment period on this proposal due to short lead time for comment, and further discussion between staff and the public, including industry.

2018 is a very short time frame for which to enact regulations that could invoke economic harm to the people of California, and industry as well. The realistic amount of emissions, versus the cost involved, appears to be an extremely SMALL gain in reduced air quality tonnage.

In general terms it appears a very large hammer is being used to kill an ant.....

David Pickett
District 36 Motorcycle Sports Committee
28831 Sierra Court
Pioneer, CA
95666