

Nicolas Harris

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6981 Kona Drive, Placerville, CA 95667  
T: (530) 626-4250 F: (530) 626-4707

[AmericanMotorcyclist.com](http://AmericanMotorcyclist.com)

April 24, 2019

Clerk of the Board  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814  
Re: Proposed Amendments to the Red Sticker Program for Off-Highway Recreational Vehicles

Dear Clerk of the Board:

On behalf of the more than 21,000 California members of the American Motorcyclist Association and the millions of other riders statewide, I offer the following comments concerning the proposed modifications to the current California Red Sticker program.

Founded in 1924, the AMA is the premier advocate of the motorcycling community. We represent the interests of millions of on- and off-highway motorcyclists. Our mission is to promote the motorcycling lifestyle and protect the future of motorcycling.

California continues to be the epicenter of the nation and, possibly, the world, for off-highway motorcycle riding. This long-established convention is due in large part to the amazing opportunities provided by the California State Parks OHV program and the opportunities it affords in the popular State Vehicular Recreation Areas and also through the valuable and enduring partnerships with other important land agencies, including the U.S. Bureau of Land Management, the U.S. Forest Service and city and county partners statewide. The benefits resulting from these recreational opportunities, especially in rural parts of the state, often provide critical economic stimulus. Any potential negative impacts should carefully considered before changes are implemented.

Thanks in large part to these amazing and diverse riding opportunities, California is also home to numerous OHV-associated manufactures, many whom are engaged in cultivating and encouraging the next generation of top-level racing talent. Likewise, a significant percentage of the current world-class motorcycle racing competitors call California their home. The AMA sanctions many of the events these riders participate in, and it is critical that any new rules governing the sale and use of competition vehicles recognizes and preserves a rider's ability to train and compete using these specialized vehicles.

The AMA wishes to acknowledge the proposal to eliminate the red sticker riding seasonal restrictions. The elimination of the "two sticker" system, as proposed, would help to

significantly reduce confusion for riders, Department of Motor Vehicles staff and law enforcement personnel. While we do support the proposal to end the red sticker program CARB must not forget that the sale, operation, and resale of existing competition motorcycles will rightfully continue.

Likewise, we appreciate the staff outreach to riders throughout this long and difficult process, as well as their openness to adopting fleet averaging and other strategies to help reduce overall emissions while preserving traditional models for competition purposes. We encourage staff to continue to seek ways to create incentives for manufacturers to pursue the development and use of new technologies, rather than simply identify and require specific equipment or techniques to meet the proposed standards.

We do remain concerned about the sample size of the two-stroke test fleet (three motorcycles) and question the use of an automobile-based testing drive cycle to determine emissions levels. By CARB's own admission, the Urban Dynamometer Driving Schedule was developed to represent urban passenger-car driving and may not accurately represent how these vehicles are operated on public lands in California. While we acknowledge that limited data is available on real world riding patterns, the use of this testing procedure and very limited testing sample size remains troubling.

Another important point is the proposed youth engine-size maximum is too low for some currently popular youth models and should be raised to 115cc to avoid the additional costs the proposal would create (staff estimated \$333 per bike). It is critical that young riders have access to appropriately sized machines, and the additional costs identified could result in riders purchasing larger bikes, if these youth models become too costly.

Another issue of concern is the ability for our competition members to engage in important testing, practice and training regiments using the same vehicles that are ridden in sanctioned competition events. Eliminating or reducing opportunities for practice would compromise rider safety and diminish the riders' competitiveness against those from other states. The competition-vehicle category also must include a system of titling and identification to help combat theft and identify competition vs. noncompetition models.

To address these concerns, we respectfully suggest the following:

- Require persons using a designated competition/red sticker vehicles to maintain a membership in a competition sanctioning body and carry their membership card with them at all times while practicing.
- Require that event sponsors issue practice permits for each person registered for a competition event and/or series. If registered for a series, only one permit need be issued for the season. This practice permit should be in the rider's possession when riding competition vehicles any time other than during the actual race event.

- Maintain the current OHV registration fee structure (already among the highest in the nation) to keep this important recreational activity as affordable as possible.

Thank you in advance for considering our comments on behalf of our California membership and riders everywhere. We remain optimistic that a mutually acceptable solution can be identified and welcome the opportunity to continue a dialog with staff and other interested stakeholders.

Sincerely,

A handwritten signature in black ink, appearing to read "Nick Haris". The signature is written in a cursive, slightly slanted style.

Nicholas Haris  
Western States Representative