

## **Comment 1 for Evaporative Emissions from Off-Highway Recreational Vehicles (ohrv2013) - 45 Day.**

First Name: Don  
Last Name: Amador  
Email Address: damador@cwo.com  
Affiliation:

Subject: OHRV 2013 Proposed Rule  
Comment:

July 18, 2013

Sent via FAX and Posted to OHRV 2013 Comment Section

California Air Resources Board  
1001 "I" Street  
Sacramento, CA 95814  
FAX: 916.445.5025

Re: OHRV 2013 - Proposed Regulation Order -Off-Highway Recreational Vehicles: Evaporative Emission Control, Title 13, California Code of Regulations - July 24 Public Comment and July 25 Hearing

Dear California Air Resources Board:

As a small business owner, OHV recreation professional, and member of the OHV user community, I am deeply concerned about the potential negative impacts of the proposed regulation order for Off-Highway Recreational Vehicles (OHRV): Evaporative Emission Control, Title 13, California Code of Regulations (Order). As you know, OHRV refers to off-road motorcycles, all-terrain vehicles, off-road sport vehicles, off-road utility vehicles, and sand cars. The Order will impact the production of said vehicles starting in 2018.

I just became aware of the Order two days ago after receiving a call from a concerned member of the OHV community. Due to a large number of other OHV-related projects on my desk and the late notice, I will not be able to produce a detailed analysis of the Order for the July 24 comment period deadline nor attend the July 25 hearing.

Since this proposed Order could have a significant impact on OHV recreation and related businesses, I contacted the California State Park Off-Highway Motor Vehicle Recreation Division (Division) after learning about the proposed Order to see if they had given any input into the proposal. Division stated they just found out about this proposed Order on Monday, July 15 and had not been consulted by CARB, a sister agency.

Here are my initial concerns about the proposed Order which are hereby submitted in time to meet the July 24 public comment period deadline.

Impacts to Competition (Red Sticker) Off-Road Motorcycles  
Impacts to "Red Sticker" Riding Seasons  
Impacts to Competition Events Including Amateur Events  
Drastic Increase in Cost of Production (all OHRVs)  
Reduction or Elimination of Certain Lines of OHRVs/Loss of Consumer  
Choice  
Fiscal Impacts to OHRV Dealerships  
Failure to Consult with Division  
Fiscal Impact to Local Economies  
Questionable Staff Analysis of Economic Impact to OHRV Recreation  
Questionable Staff Analysis of Environmental Benefit  
Over Optimistic View of Future OHMVR Sales

Based on my aforementioned concerns, I respectfully request the following:

Postpone Order/Rule and extend the public comment period until CARB consults with Division scientists and resource professionals to "ground-truth" CARB staff assumptions related to projected OHRV sales or usage, economic impacts to OHV-related businesses, impacts to competition events, impacts to red sticker riding seasons or usage, or environmental benefits of the rule.

Thanks in advance for your consideration of this request.

Don

Don Amador  
555 Honey Lane  
Oakley, CA 94561  
Email: damador@cwo.com

cc: Governor Jerry Brown  
Senator Mark DeSaulnier  
Assembly Member Jim Frazier  
CA State Parks OHMVR Division

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2013-07-18 07:20:01

1 Duplicates.

**Comment 2 for Evaporative Emissions from Off-Highway Recreational Vehicles (ohrv2013) - 45 Day.**

First Name: Ross

Last Name: Liberty

Email Address: fpross@factorypipe.com

Affiliation: President, Factory Pipe LLC

Subject: Proposed new permeability regulations for OHV

Comment:

This is very short notice for this important regulation. I would appreciate a little more time to go over these proposed regulations before opining in. I am in support of the notion of such regulations but, simply put, this is too short a fuse.

Best regards,

Ross H. Liberty

President, Factory Pipe LLC

OEM exhaust supplier to the motorsports industry.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2013-07-18 09:40:02

No Duplicates.

**Comment 3 for Evaporative Emissions from Off-Highway Recreational Vehicles (ohrv2013) - 45 Day.**

First Name: Erik  
Last Name: Schaffer  
Email Address: eriktheexpert@att.net  
Affiliation:

Subject: OHV emissions  
Comment:

I am opposed , and there is not enough time to comment.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2013-07-19 20:59:52

No Duplicates.

**Comment 4 for Evaporative Emissions from Off-Highway Recreational Vehicles (ohrv2013) - 45 Day.**

First Name: Rasto

Last Name: Brezny

Email Address: rbrezny@meca.org

Affiliation: Manufacturers of Emission Controls Assoc

Subject: MECA Comments in Support of OHRV Evap. Proposal

Comment:

Please find attached the comments of the Manufacturers of Emission Controls Association (MECA) in Support of Staff's Proposal to measure and control evaporative emissions from off-highway recreational vehicles. If you have any questions or need additional information, please let me know.

Rasto Brezny  
Deputy Director  
MECA

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/8-ohrv2013-BmsBYIMxBDYKUwB0.pdf>'

Original File Name: MECA Testimony ARB OHRV Evap 072513.pdf

Date and Time Comment Was Submitted: 2013-07-22 12:13:32

No Duplicates.

## **Comment 5 for Evaporative Emissions from Off-Highway Recreational Vehicles (ohrv2013) - 45 Day.**

First Name: Greg  
Last Name: Knott  
Email Address: gknott@opei.org  
Affiliation:

Subject: OPEI Comments to Proposed Regulation Order and Test Procedure for EVAP Emissions

Comment:

The Outdoor Power Equipment Institute (OPEI) is pleased to provide comments on ARB's May 2013 proposed regulation order and test procedure for determining evaporative emissions from OHRV's. Please see the comments dated 23Jul13 in the proposed regulation and test procedure immediately following this letter.

&#61623; Draft Regulations, see section/subsection: (d)(4), (d)(8) and (h)(7)

&#61623; TP&#8208;933 Test Procedure, see section/subsection: 1.1.9, 2, 6.4.2.5

In addition to the July 25, 2013 workshop, OPEI and representatives of member companies are available to discuss these comments with the ARB at your convenience.

Thank you for the opportunity to review and provide input.

Kind regards,

Greg Knott  
Director Industry Affairs  
Outdoor Power Equipment Institute

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/9-ohrv2013-AW5WIABkAzkFXFIx.pdf>'

Original File Name: OPEI Comments to ARB OHRV UTV NPRM 23Jul13.pdf

Date and Time Comment Was Submitted: 2013-07-23 15:01:26

No Duplicates.

**Comment 6 for Evaporative Emissions from Off-Highway Recreational Vehicles (ohrv2013) - 45 Day.**

First Name: Tom  
Last Name: Austin  
Email Address: taustin@sierraresearch.com  
Affiliation: Motorcycle Industry Council

Subject: MIC Testimony  
Comment:

MIC testimony attached. MIC's position is essentially "support if amended" as suggested in attached testimony. MIC Vice-President Pamela Amette and MIC consultant Tom Austin will both be available to respond to any questions.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/10-ohrv2013-Uz5RPlc1UFwKb1Q7.pdf'

Original File Name:  
MIC\_Comments\_OHRV\_Evaporative\_Emissions\_Public\_Hearing\_072513.pdf

Date and Time Comment Was Submitted: 2013-07-24 11:52:01

No Duplicates.

**Comment 1 for Evaporative Emissions from Off-Highway Recreational Vehicles (ohrv2013). (At Hearing)**

First Name: Nick

Last Name: Haris

Email Address: nharis@ama-cycle.org

Affiliation: American Motorcyclist Association

Subject: comments for proposed ARB action

Comment:

please see attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/11-ohrv2013-VjhcM1AyAzsCWwBo.pdf>

Original File Name: Nick Haris.pdf

Date and Time Comment Was Submitted: 2013-07-26 10:20:32

No Duplicates.



## **Comment 2 for Evaporative Emissions from Off-Highway Recreational Vehicles (ohrv2013). (At Hearing)**

First Name: Ryan  
Last Name: Chamberlin  
Email Address: rynomoto@yahoo.com  
Affiliation: ATV Safety Institute

Subject: Emissions Estimation Methodology for OHV  
Comment:

There are a few questions that must be answered to establish the importance of this emissions action.  
First, DMV registrations have been increased due to the a new law that allows DMV to garnish wages and place liens on outstanding unregistered OHVs.  
Second, The new fuels in California with 10% Ethonal have been causing issues with fuel tank swelling. Thus, more evaporation?  
Next, The study neglected the fact that manufactures recommends to drain complete fuel system prior to storage. This helps to reduce contamination of the fuel residue during storage.  
Next, Standard deviation was not recorded or documented. Witch shows the accuracy of the test results, graphs, charts, estimations, etc.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-07-26 10:20:32

No Duplicates.

**Comment 3 for Evaporative Emissions from Off-Highway Recreational Vehicles (ohrv2013). (At Hearing)**

First Name: Henry

Last Name: Hogo

Email Address: hhogo@aqmd.gov

Affiliation: South Coast AQMD

Subject: South Coast AQMD Staff Comments

Comment:

Please see attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/13-ohrv2013-Vj5dPgdoAyJVKIMM.pdf>

Original File Name: Henry Hogo.pdf

Date and Time Comment Was Submitted: 2013-07-26 10:20:32

No Duplicates.

**Comment 1 for Evaporative Emissions from Off-Highway Recreational Vehicles (ohrv2013) - 15-1.**

First Name: Nick  
Last Name: Haris  
Email Address: nharis@ama-cycle.org  
Affiliation: AMA

Subject: Control Evaporative Emissions from Off-Highway Recreational Vehicles  
Comment:

Comment letter attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/15-ohrv2013-BmdSJgZIBAgEZFU8.pdf>

Original File Name: ARB final.pdf

Date and Time Comment Was Submitted: 2014-01-28 09:25:39

No Duplicates.

**Comment 2 for Evaporative Emissions from Off-Highway Recreational Vehicles (ohrv2013) - 15-1.**

First Name: bill

Last Name: mccarthy

Email Address: williammccarthy55@comcast.net

Affiliation:

Subject: off-road vehicles Regulations

Comment:

My only objection is to any proposed Regulations or Standards that exceed the Original Manufactured Exhaust performance of any Off Road or farm vehicle or product after such extended use. Ex. a dirt bike produced in 1970 and is still operating after 200,000 miles should only be judged on its orig. performance plus the expected reduction in performance common with that mileage. Using only the Level Highest expected Exhaust readings as a standard. To do otherwise is Dishonest! Invites cheaters.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-01-29 11:04:40

No Duplicates.

**Comment 3 for Evaporative Emissions from Off-Highway Recreational Vehicles (ohrv2013) - 15-1.**

First Name: David

Last Name: Pickett

Email Address: D36LAO@VOLCANO.NET

Affiliation: District 36 Motorcycle Sports Committee

Subject: Evaporative Emissions from OHRV

Comment:

See attached comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/17-ohrv2013-BjRVY1RkWD8HLAIy.pdf>

Original File Name: 2014-01-29 comment from David Pickett.pdf

Date and Time Comment Was Submitted: 2014-01-31 14:07:45

No Duplicates.

**Comment 1 for Evaporative Emissions from Off-Highway Recreational Vehicles (ohrv2013) - 15-3.**

First Name: Shane

Last Name: Parks

Email Address: mussmp@msn.com

Affiliation:

Subject: New gas cans suck

Comment:

I'd like to thank your organization for making it a national law to make gas cans that suck now I think your organization should pay to get the nozzle from one of the new junk cans out of my atvs gas tank.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-08-13 19:24:41

No Duplicates.

**Comment 2 for Evaporative Emissions from Off-Highway Recreational Vehicles (ohrv2013) - 15-3.**

First Name: Pamela

Last Name: Amette

Email Address: pamette@mic.org

Affiliation: Motorcycle Industry Council

Subject: MIC Comments to 3rd Notice of Modified Text, OHRV Evaporative Emissions Regulations

Comment:

Please find attached comments submitted by the Motorcycle Industry Council regarding the 3rd notice of modified text to the proposed OHRV evaporative emission regulations.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/30-ohrv2013-AWxdMIAyUFwCZwhn.pdf>

Original File Name: MIC Comments\_15 Day Notice\_CARB OHRV Evap Regulations\_082214.pdf

Date and Time Comment Was Submitted: 2014-08-25 16:20:11

No Duplicates.

**Comment 1 for Evaporative Emissions from Off-Highway Recreational Vehicles (ohrv2013) - 15-4.**

First Name: william

Last Name: mccarthy

Email Address: williammccarthy55@comcast.net

Affiliation:

Subject: Off highway regs.

Comment:

This group of Proposed Regs. makes little sense and targets too small a concern to be anything but OVER EXAGGERATION of needs! Any thing to MAKE WORK and GROW the Bureaucracy that is The AIR BOARD. USELESS and UNNECESSARY IS THE ONLY TRUTH to these Proposed Regs.. Please STOP the FOOLISHNESS!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-09-18 11:40:13

No Duplicates.