



March 7, 2023

The Honorable Chris Gorsek
Co-Chair
Joint Transportation Committee
900 Court St NE State Capitol
State Capitol, S-403
Salem, OR 97301-4042

The Honorable Susan McLain
Co-Chair
Joint Transportation Committee
900 Court St NE State Capitol
State Capitol, H-477
Salem, OR 97301-4042

Re: ROHVA and SVIA oppose HB 3248

Dear Co-Chairs Gorsek and McLain:

The Recreational Off-Highway Vehicle Association (ROHVA)¹ and the Specialty Vehicle Institute of America (SVIA)² oppose HB 3248 because it allows all-terrain vehicles (ATVs) and certain recreational off-highway vehicles (ROVs – sometimes referred to as side-by-sides or UTVs) to register and operate on all highways, except interstate highways.

ROHVA's and SVIA's primary goals are to promote safe and responsible use of ATVs and ROVs. ROHVA and SVIA oppose legislation allowing ATVs and ROVs on roads that are not part of a designated trail system because:

- ATV and ROV manufacturers design, test, and sell ATVs and ROVs for off-highway use only.
- Unlike cars and trucks, ATVs and ROVs do not meet Federal motor vehicle safety standards.

Allowing ATVs and ROVs on roads falsely signals that this practice is safe. It is not. ATV and ROV manufacturers, along with the National Highway Traffic Safety Administration, stress that ATVs and ROVs are not designed for use on public roadways. The vehicles do not handle properly on paved roads. They also lack safety equipment required to protect occupants in the event of a collision. On-road ATV and ROV operators and passengers face increased risks of losing vehicle control. Collisions with cars and trucks also pose an increased risk of injury.

¹ ROHVA is a national, not-for-profit trade association formed to promote the safe and responsible use of recreational off-highway vehicles (ROVs) manufactured or distributed in North America. ROHVA is also accredited by the American National Standards Institute (ANSI) to serve as the Standards Developing Organization for ROVs. An ROV is a motorized off-highway vehicle that is compliant with the ANSI/ROHVA 1 standard. More information on the standard can be found at <https://rohva.org/ansi-standard/>. ROVs are designed to travel on four or more tires, intended by the manufacturer for use by one or more persons and having the following characteristics: a steering wheel for steering control; a Roll Over Protective Structure complying with ANSI/ROHVA-1; an Occupant Retention System complying with ANSI/ROHVA-1; non-straddle seating; maximum speed capability greater than 30 mph; less than 80 inches in overall width, exclusive of accessories; and engine displacement of less than 1,000cc. Current models are designed with seats for a driver and one or more passengers.

² SVIA is the national not-for-profit trade association representing manufacturers, dealers, and distributors of all-terrain vehicles (ATVs) in the United States.

These risks remain even when owners or aftermarket providers install different tires or modify ATV or ROV equipment in other ways.

ROHVA and SVIA urge states to prohibit ATV and ROV use on public roads and strengthen law enforcement efforts to eliminate this dangerous practice. States could prevent a substantial number of ATV- and ROV-related injuries if laws kept ATVs and ROVs off public roads, which ROHVA³ and SVIA⁴ propose in model legislation.

Thank you for your consideration of these comments. Should you have any questions, please contact me at 703-416-0444 ext. 3202.

Sincerely,



Scott P. Schloegel
Senior Vice President, Government Relations

³ <https://rohva.org/model-law/>

⁴ <https://svia.org/model-state-legislation/>