

Chris Frisbee, Acting Forest Supervisor  
215 Melody Lane  
Wenatchee, WA 98801

March 26, 2015

Dear Acting Forest Supervisor Frisbee:

As individuals and organizations dedicated to reducing deaths and injuries caused by All-Terrain Vehicles (ATVs), we are writing to inform you of the dangers of allowing ATVs on public roads, and in opposition to the proposed pilot program that would open a number of U.S. Forest Service Roads in the Cle Elum Ranger District of the Okanogan-Wenatchee National Forest to ATVs.

We urge you to reconsider any proposal that that would expand ATV use on public roads because an expansion of ATV access to roads is contrary to public safety and puts the operator and others at risk of severe injury or death.

ATVs should not be driven on public roads because driving ATVs on public roads is more dangerous than operating them off-road, ATVs are not designed for roadway use, and ATV manufacturers have policy statements strongly urging consumers not to operate their vehicles on public roads.

ATV roadway crashes account for over 60% of deaths and over 30% of serious injuries. Roadway crashes are more likely to involve multiple fatalities, carrying passengers, collisions and head injuries. Victims in roadway crashes were less likely to be wearing protective gear such as helmets and were more likely to be carrying passengers.

Most importantly, ATVs are not designed to operate on paved or public roads. An ATV's narrow wheelbase and high clearance are designed for riding in pastures, fields and wooded areas. The high center of gravity increases the risk of rollovers, particularly at roadway speeds. In addition, ATV's knobby, low-pressure tires allow for operation on a variety of surfaces, but they do not grip roadway surfaces well (paved or unpaved). As tire-surface interaction deteriorates with increasing speed, the operator can lose control of the vehicle, endangering not only the ATV rider but also occupants of other vehicles, pedestrians, and bicyclists. Also, many ATVs lack a rear differential which can compound on-road handling challenges. The lack of a rear differential results in the wheels on both the inside and outside of a turn rotating at the same speed even though the wheels on the outside of the turn cover more distance. This design problem is mitigated on off-road surfaces like dirt and grass but makes the machine much more difficult to control on-road.

The Specialty Vehicle Institute of America (SVIA), a not-for-profit association representing ATV manufacturers and dealers, has a strong policy statement against the use of ATVs on public roads. A training manual for ATV riders from the ATV Safety Institute, a division of SVIA, states:

Remember, ATVs are intended for off-road use only. Never operate an ATV on public roads, and always avoid paved surfaces. ATVs are not designed for use on public roads and other motorists may not see you. ATVs are not designed to be used on paved surfaces because pavement may seriously affect handling and control.”<sup>1</sup>

Further, the SVIA makes clear that:

ATVs are designed, manufactured and sold for off-road use only. On-road vehicles must be manufactured and certified to comply with U.S. Department of Transportation Federal Motor Vehicle Safety Standards (FMVSS). These safety standards consist of extensive and detailed compliance requirements. Since ATVs are not intended to be used on-road, they are not designed, equipped or tested to meet such standards.<sup>2</sup>

This statement shows that the manufactures of these vehicles, those who know the vehicles better than anyone, are clear that they should not be operated on public roads. In addition, the mandatory rules for ATVs require that all ATVs have a label indicating that ATVs should not be operated on paved roads or on public roads.

Consumer Federation of America (<http://www.consumerfed.org/pdfs/ATVs-on-roadways-03-2014.pdf>) and the Insurance Institute for Highway Safety (<http://www.iihs.org/frontend/iihs/documents/masterfiledocs.ashx?id=2056>) recently released reports documenting the dangerous trends associated with ATV operation on public roads.

The latest research on ATVs on roads; ATV death and injury data; lists of members of a new coalition formed to address this public health crisis; and advocacy efforts undertaken by this coalition are available at <http://consumerfed.org/ATVunsafeonroads>.

We urge you to reconsider any proposal that would expand ATV use on roads because ATVs on roads place the public, including ATV operators, pedestrians, bicyclists, and all motor vehicle drivers and their passengers at unnecessary risk.

We hope that you will consider these comments, and if we can be of further assistance, please feel free to contact Michael Best at Consumer Federation of America at [mbest@consumerfed.org](mailto:mbest@consumerfed.org) or (202) 939-1009.

Sincerely,

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<sup>1</sup> Available on the web at [http://www.atvsafety.org/InfoSheets/ATV\\_Riding\\_Tips.pdf](http://www.atvsafety.org/InfoSheets/ATV_Riding_Tips.pdf) on page 7.

<sup>2</sup> Specialty Vehicle Institute of America, “Position in Opposition to On-Road Operation of ATVs,” available on the web at <http://wisdotresearch.wi.gov/wp-content/uploads/tsratvlaws1.pdf>.

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