

From: EKlim@aol.com
To: [P65Public Comments](#)
Subject: Clear and Reasonable Warning Regulation
Date: Thursday, April 16, 2015 11:52:30 AM

International Snowmobile Manufacturers Association

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April 16, 2015

Ms. Vela
p65public.comments@oehha.ca.gov

Subject: ***Clear and Reasonable Warning Regulation***

Dear Ms. Vela,

The comments that were submitted by the Motorcycle Industry Council (MIC) on April 8, 2015 are supported by the members of the International Snowmobile Manufacturers Association (ISMA). ISMA is an international non-profit trade association representing the four manufacturers of snowmobiles in the United States. They are: Arctic Cat, Bombardier Recreational Products, Polaris, and Yamaha.

As was stated by the MIC comments, we also appreciate this initiative on the part of the agency to update various aspects of the long-standing proposition 65 to bring needed clarity to article 6: *Clear and Reasonable Warning Regulation*.

As noted in the MIC comments, we believe that snowmobiles should be included as a vehicle but it does need to be clarified. For example: the section 465 Definition of a Passenger Vehicle includes snowmobiles, however, it could not be possible for snowmobile manufacturers to place a warning label on the driver's side front window.

In view of this we strongly urge that the OEHHA expand the definition of a 'Passenger Vehicle' to clarify and include snowmobiles under the safe *harbor Clear and Reasonable Warning Regulation*.

The placement of a label other than to the front window of a driver side must be designated for snowmobiles. A hang tag should be considered.

Also relative to the warnings content, we support the MIC's position completely. We would also ask that a 3 year lead time be adopted since it would be more helpful in view of production lead times and model year changes. It should also be noted that this past year the manufacturers collectively sold 416 new snowmobiles in the state of California. Sales were down in California because of a lack of snowfall, but the market continues to be weak relative to the population size in California.

Thank you for your consideration of these brief comments.

Sincerely,

Ed Klim

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President,

International Snowmobile Manufacturers Association

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