

Paul Vitrano  
08-10-4



RECREATIONAL OFF-HIGHWAY  
VEHICLE ASSOCIATION

November 20, 2008

Clerk of the Board, Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Dear California Air Resources Board Members:

The Recreational Off-Highway Vehicle Association (ROHVA) is a national trade association representing manufacturers and distributors of recreational off-highway vehicles (ROVs), also known as side-by-side off-highway vehicles. ROHVA members include Arctic Cat, Honda, Kawasaki, Polaris and Yamaha.

Many ROHVA member products are categorized as Off-Road Sport Vehicles under the Air Resources Board's Off-Highway Recreational Vehicle regulations. However - depending on the engine / vehicle configuration - some ROHVA member products could potentially be covered by the LSI Engine < 1 L regulations.

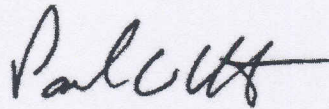
Please accept the following comments on the proposed regulation changes:

- *ROHVA supports functional harmonization between U.S. EPA and ARB vehicle classification systems.* ROHVA is concerned by the fact that some ROVs covered under the U.S. EPA's recreational vehicle emission regulations could be subject to the ARB's LSI engine regulations. The LSI engine regulation would apply to a small segment of ROVs with a payload capacity above the 600 lbs threshold in the ARB's Off-Road Sport Vehicle category, but less than the 1,000 lbs limit associated with what the EPA considers "primarily intended for recreational purposes". This creates unnecessary discontinuities in emission limits, vehicle cost, and administrative procedures for what are otherwise substantially similar vehicles. ROHVA proposes that all vehicles covered by the U.S. EPA's recreational vehicle regulations be excluded from the ARB LSI engine limits and instead be covered by the emission limits and test procedures in the ARB Off-Highway Vehicle regulations. ROHVA also proposes that such harmonization occur at this time, rather than at some time in the future as suggested in the Initial Statement of Reasons.
- *In the event that the functional harmonization advocated above is not adopted, ROHVA urges a model year 2012 or later applicability date for the reduced emission limits that would apply under the LSI Engine < 1 L proposal.* The proposed model year 2011 schedule does not allow adequate lead time to achieve the substantial

exhaust and evaporative emission reductions required, compared to the current standards. ROV manufacturers typically introduce their new model year production mid-way through the prior calendar year (e.g., in June or July). Even if the regulations were adopted today, the changes proposed for model year 2011 would allow less than two years lead time, which is not adequate. We expect this to be an issue for other companies covered by the regulation, not just ROHVA members.

ROHVA appreciates ARB staff's recognition of important ROV issues in this proposal. Thank you for the opportunity to provide comments to the Board. ROHVA looks forward to working with ARB on ROV-related issues in the future.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Paul Vitrano". The signature is fluid and cursive, with a long horizontal stroke at the end.

Paul C. Vitrano  
Executive Vice President & General Counsel