

Lawrence Keller  
08-10-4



November 21, 2008

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

Dear California Air Resources Board Members:

Polaris Industries Inc. is a manufacturer of snowmobiles, on-road motorcycles, all terrain vehicles (ATVs), and recreational off-highway vehicles (ROVs) also known as side-by-side off-highway vehicles.

Polaris is a member of the Recreational Off-Highway Vehicle Association (ROHVA). We support ROHVA's written comments on the LSI Engine < 1 Liter proposal that were physically submitted in hard copy form today.

Polaris has worked with ARB staff throughout this rulemaking. We appreciate the consideration that has been given to ROV concerns. Our comments today address certain ROV's that meet the off-road sport vehicle (ORSV) definition in 13 CCR 2412, except for the 600 lbs payload criterion. The vehicle has a payload capacity no greater than 1000 lbs and it meets the US EPA "primarily intended for recreational purposes" guidance that was issued in March 2008 (EPA CISD-08-04). This and other attributes qualify the subject ROV for certification as an ATV under the federal regulations.

Under the current ARB proposal, the engine in this vehicle would be regulated under the LSI < 1 Liter provisions. If the engine remains subject to this ARB classification, a California-only model would ultimately be required. The California market represents about 10% of the projected U.S. sales, and it would be hard to justify doing so in this relatively small and competitive market segment.

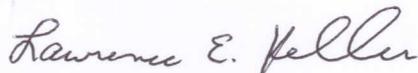
Polaris has the following comments on the LSI Engine < 1 Liter proposal:

- We believe the vehicle classification system should be modified so that the subject ROV engines are covered under the OHRV regulations, instead of LSI. This is consistent with the staff's longer term recommendation, and it would functionally align with the federal approach.
- The most appropriate current approach if these engines must be included in the LSI Engine < 1 Liter regulation would be for these ROV engines to be immediately subject to the ORSV exhaust and evaporative emission limits, but within the LSI < 1 Liter regulation. The vehicles would ultimately be covered instead by the OHRV regulations in accordance with the staff's recommendation.

- We support the staff's recommendation to allow use of the off-highway recreational vehicle test procedures and certification procedures, since the subject ROV's use ATV engines and are substantially similar to ORSV's that use these procedures. This will streamline the certification process and eliminate the need for different test procedures for ARB and EPA certification.
- We support the staff's recommendation to exclude the subject engines from the proposed 2015 engine-based emission standards, and instead to subject these ROV's to appropriate vehicle-based emission standards.
- In the event that the OHRV classification issue cannot be simply addressed now by functionally harmonizing the vehicle classification system or by adopting the ORSV exhaust and evaporative emission limits under the LSI regulations as described above, Polaris requests that a model year 2012 or later applicability date be established for the new emission limits that would apply under the current LSI Engine < 1 Liter 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. The addition of an exhaust catalyst and an evaporative canister to the subject ROV would be required to meet the new LSI standards. The recreational vehicle application presents special challenges based on the wide variety of environments in which this type of product is used. ROV manufacturers including Polaris 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.

Polaris appreciates the ARB staff's recognition of the ROV issues associated with the LSI Engine < 1 Liter rulemaking. Thank you for this opportunity to provide comments to the Board.

Respectfully submitted,



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