

April 17, 2019

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

RE: KAWASAKI MOTORS CORP., U.S.A. COMMENTS TO PROPOSED AMENDMENTS TO THE RED STICKER PROGRAM FOR OFF-HIGHWAY RECREATIONAL VEHICLES

Clerk of the Board,

Kawasaki Motors Corp., U.S.A. (KMC) is headquartered in Foothill Ranch, CA with regional sales and/or distribution offices in New Jersey, Georgia, Texas, and Michigan. KMC engages in the sale, marketing, product service, and distribution of recreational and utility motorized vehicles including motorcycles, ATVs, Side x Side, and personal watercraft through a network of more than 1,100 dealers nationwide, 87 of which are in California. Following are the KMC's formal public comments regarding the California Air Resources Board's (CARB) Proposed Amendments to the Red Sticker Program for Off-Highway Recreation Vehicles.

1. KMC supports allowing youth models with an actual maximum displacement of 112 cc to make use of the alternate standards and requirements for youth-oriented off-highway motorcycles (OFMC) and all-terrain vehicles (ATVs). Historically several youth models marked in the 110 cc category, have an actual displacement of 112 cc. Allowing this change, which CARB staff has indicated support for during previous meetings/workshops, would keep current 110 cc category models from being excluded.
2. Specific to component certification, S2418(e) Table 3 footnote (1) refers S2118(c)(2) and (3). However, S2418(c)(2) is for small volume manufacturers and it does not clearly state that the EPA standard is to be followed. Additionally, S2418(c)(3) is for SIME component certification. The process is more complicated due to the many differences when compared to the EPA process; more test samples, the requirement for outside testing, and the creation of a longer lead time of an additional 90 days.

KMC would request that staff consider also referring to S2412 (c)(1) that was previously referred to and consistent with EPA evaporative standards before current the TP-933 process. We experienced substantial confusion when the TP-933 certification process became effective. We would ask staff to include a clear explanation in the regulation so that current and future CARB certification staff will also have the same understanding. In the interim and specific to Tier III, KMC would request that manufacturers be allowed to use the current certification.

Kawasaki Motors Corp., U.S.A.

26972 Burbank, Foothill Ranch, California 92610-2506 | P.O. Box 25252, Santa Ana, California 92799-5252 | 949.770.0400 | www.kawasaki.com

Kawasaki

3. The process to develop and redesign in order to comply with new regulations takes three years. Under the proposed amendments, the 2022MY ATV standard falls well inside this development window.

The 2022MY certification process starts at the beginning of the 2021CY, if the adoption of this regulation takes place at the end of this year or beginning of the 2020CY, manufacturers will only have one year to prepare and complete 2022MY development. It is simply not possible to accomplish this in such a short period of time.

If the ATV alternative phase in plan were to accept Tier 3 until the 2026MY, as is the case for OFMC, manufacturers would have sufficient lead time to make appropriate development plans while minimizing the impact to consumers and dealers. Additionally, if the adoption of the proposed amendments is further delayed beyond the end of the 2019CY, then an alternative reasonable lead time, three years from the date of adoption, should be considered.

4. Under the current OHRV regulations, some OHRVs transitioned from compliant Green Sticker models certified with E0 (indolene) certification fuel to non-compliant Red Sticker models. Manufacturers may consider once again certifying these as compliant Green Sticker models using the alternative phase in procedure currently proposed in the draft amendments. The draft amendments also include a requirement for the use of E10 test fuel starting from the 2020MY. This requirement creates a barrier for manufacturers to recertify some OHRVs back to compliant Green Sticker models. We ask CARB to consider an exemption to the E10 test fuel requirement if an OHRV model was previously certified using E0 (indolene) certification fuel and add language to the proposed amendments confirming the exemption.
5. KMC requests that staff add a 2.0 psi PRV as alternative vapor control method in addition to the 1.0g/L canister. The availability of such an option in the regulation would provide manufacturers with an alternate way to provide compliant OHRVs to California consumers and dealers.
6. The existing small volume manufacturer's hose standard rule is too strict. The 5.0g/m²/day standard cannot be achieved utilizing rubber hose, even if equipped with a barrier layer, which most small volume manufacturers are likely to use. We would request that staff allow manufacturers to follow Tier II in Table 3 in S2418(e) by adding this option during this revision process.

Respectfully submitted,



Russ Brennan
Sr. Advisor Government Relations & Public Affairs
Kawasaki Motors Corp., U.S.A.