

To: Scott Bacon

From: Russ Brennan

Date: July 25, 2019

Subject: Kawasaki Motor Corp., U.S.A. Comments on Modified Text for the Proposed Amendments to the Red Sticker Program for Off-Highway Recreational Vehicles

cc: A. Hakotani

1) ATV Phase-in Consideration: S2418.(e)

Please give additional consideration to providing ATVs with sufficient lead time to comply with Tier I. Starting with the 2022MY is impossible for the manufacturers who focused mainly on SxS TP-933 compliance. The same phase-in timing as off-road motorcycle would be helpful in planning development of ATVs that can meet new standard. We again state generally, that at least three years is needed for the development of new emission control components to ensure emission level compliance and account for chassis modifications. Even the addition of a small bracket, requires full endurance testing. This three year lead time would be counted after the final rule adoption, as manufacturer cannot take action before final rule is adopted.

2) Avoiding Long Term Certification Period: S2418.(c)(3), S2419.4(b)(3), S2419.4(b)(4)(I) and (J)

The revised draft appears to still require component EOs. Allowing EPA applications looks fine but does not serve to shorten certification lead time, as it cannot guarantee 90-day vehicle approval after submission of the application. We believe creating a new paragraph would be beneficial in providing a clearer understanding that both vehicle certification and component certification is allowable. Otherwise, it could take manufacturers almost half a year for certification. (90 days for components and 90 days for vehicles)

S2418.(c)(3) refers only to S2419.4.(b)(3) that requires labeling on the component. Component labeling requirements usually extend parts manufacturing lead times by an additional three months and also increase the parts cost due to required tooling changes. These issues could create a heavy burden for the manufacturers.

Additionally, alternative phase-in vehicles should be exempt from warranty requirements S2419.1 and S2419.2, because most of the models would be identical to current EPA certified vehicles or CARB certified before 18MY which would not be redesigned in order to minimize the financial impact to both the market and manufacturer. These models would be covered by EPA's emission warranty requirement (30 month/5,000 km). We believe this is a sufficient requirement for the phase-in term.

We strongly recommend that CARB staff consider a clearer explanation of the regulation for component certification data review during vehicle certification which would preserve the usual 90 day certification lead time.

3) Misc.

S2412.(d)(1)(A)

What is the unit of negative one (1) for zero emission off-road vehicles? Is it g/km?

S2418.(c)(2)(A) and (B)

What is the CARB's direction on CCD-05-14 which allows high-temp accelerated testing? Will an FAQ be issued for this regulation?

S2419.4(b)(5)(C)

Describing five samples at the beginning of the paragraph may create confusion that five samples are required from 2020MY certification. This issue is clearly described separately in the regulation language. This has the potential to create confusion for CARB cert reps.

Other:

We still need to have E0-E10 certification guideline document for C/O engine families ASAP. Otherwise, we cannot schedule time for durability testing of 2022MY alternative green sticker vehicles.