# RED STICKER OFF-HIGHWAY RECREATIONAL VEHICLE (OHV) WORKSHOP

APRIL 18, 2017



California Environmental Protection Agency

# Background

- Red Sticker Assessment Findings
- Proposed Path Forward
- Next Steps



# **Red Sticker Program Background**

- OHV exhaust emissions standards were first adopted in 1994
  - Controlled OHVs qualify for green registration sticker
- In 1998 CARB established the Red Sticker program
  - Temporary solution to address industry concerns over the availability of emissions compliant OHVs
  - Allows OHVs with <u>uncontrolled</u> emissions to be certified
- Red Sticker OHVs are subject to limited use restrictions
  - Riding calendar restricts use on public land during summer in ozone non-attainment areas
  - Year-round use on public land in attainment areas and on private land statewide



#### **Types of OHVs**



<sup>1</sup> Federally regulated (exempt from CARB standards)



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# **Directive to Reduce Emissions from Red Sticker OHVs**

- Regulation to control evaporative emissions from OHVs proposed in 2013
  - Required stringent control of reactive organic gas (ROG)
  - Emissions benefit of 9.9 tons per day (tpd<sup>1</sup>) ROG in 2035
- Red Sticker OHVs excluded from adopted regulation
  - Reduced benefit of rule by 3.3 tpd<sup>1</sup> ROG in 2035
- Board directed staff to return by December 2015 with a solution to reduce emissions from Red Sticker OHVs
  - Began assessment of Red Sticker program in 2014
  - Additional time needed to conduct technical assessment



## **Assessing the Red Sticker Program**

**ORIGINAL PURPOSE OF PROGRAM** 

Delay 1998 exhaust standards to ensure OHV availability

Ease transition from 2- to 4stroke technology

Limit summertime exhaust emissions from OHVs in ozone non-attainment areas

Provide exemption for competition OHVs



# Red Sticker Assessment



## **Red Sticker Assessment Components**

#### **POPULATION EVALUATION**

- Develop VIN decoder
- Analyze population trends over time

#### **EMISSIONS TESTING**

- Measure evaporative and exhaust emissions
- Evaluate emissions significance

#### **OWNER SURVEY**

- Conduct usage and activity survey
- Investigate impact on seasonal operation



# **Population Evaluation Methodology**

- Enhanced ability to analyze OHV population and certification data
  - Digitized Executive Orders (EO) into single database
  - Developed VIN decoder for DMV registration data
- Evaluated population and certification trends





## **Emissions Testing Methodology**

- Conducted exhaust and evaporative emissions testing
  - 2- and 4-stroke OHMCs of common displacement ranges
  - 18 new and in-use OHMCs selected based on DMV data
- Evaluated significance of Red Sticker emissions



Sealed Housing for Evaporative Determination (SHED)



Motorcycle / ATV Dynamometer (Exhaust)



# **Owner Survey Methodology**



Share your views to receive a FREE California SVRA day pass!

- Conducted statewide OHMC owner survey
- Online survey hosted by UC Davis
- Nearly 3,000 respondents
- State Parks provided 2,274 day use passes as incentive
- Questions developed with extensive input from industry



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# **Population of OHVs in California**



# **OHMCs sold Today are Predominately Red Sticker**

#### Sticker Type of Vehicles Sold Since 2012<sup>1</sup>



- Red Sticker ATVs have transitioned to Green Sticker
- More Red Sticker
  OHMCs are sold than
  Green Sticker

<sup>1</sup>Source: 2015 DMV database



#### **ATV Models have Transitioned to Green Sticker**



<sup>1</sup> # of models certified by top 5 ATV manufacturers



## **OHMC Models have not Transitioned to Green Sticker**



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# **Red Sticker OHMCs are Primarily 4-Stroke**

- In 1998, when the Red Sticker program was adopted, 40% of OHVs were 4-stroke<sup>1</sup>
- In 2012-2016, 71 % of Red Sticker OHMCs registered were 4-stroke<sup>2</sup>
  - Overall, during this time period 85% of all OHMCs registered were 4-stroke
- Today, 2-stroke OHMCs are still used in cross-country competitive events, while motocross is primarily 4-stroke

<sup>1</sup> Source: 1998 OHV Final Statement of Reasons <sup>2</sup> Source: 2015 DMV Database



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#### **OHMCs Produce Evaporative and Exhaust Emissions**





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## **Red Sticker OHMCs Exceed Exhaust Emissions Standards**



<sup>1</sup>HC standard applies to CA Green Sticker OHVs (1994+) <sup>2</sup>European on- and off-highway motorcycle standard



# **Red Sticker Exhaust Emissions are Significant**



<sup>1</sup> RV2013 emissions factor (34.2 g/mi HC)

- <sup>2</sup> 2016 KTM 450XC-W Certification (0.25 g/mi HC)
- <sup>3</sup> 2016 Ducati XDiavel Certification (0.04 g/mi HC)

<sup>4</sup> 2014 EMFAC light-duty passenger vehicle emissions (0.009 g/mi HC)



#### **Red Sticker OHMCs Exceed Evaporative Emissions Standards**



<sup>1</sup> CARB 2013 OHV Evaporative Emissions Regulation



# **Evaporative Emissions Prevalent in Non-Attainment Areas**



#### Spatial Distribution of Registered Red Sticker OHMCs

- 95% of OHMCs are stored where registered<sup>1</sup>
- 90% of OHMCs are registered in non-attainment areas<sup>2</sup>
- Over 1/3 of OHMCs are registered in South Coast<sup>2</sup>

<sup>1</sup> Source: 2016 OHMC Survey <sup>2</sup> Source: 2013 DMV Database



#### **Riding Calendar does not Prohibit Summertime use**





- 75% of Red Sticker owners registered in ozone non-attainment areas ride during the summer
  - 43% travel further to ride
  - 54% operate on private land during the summer<sup>1</sup>
  - 25% operate on unenforced public land<sup>1</sup>
- 93% of Red Sticker operation on private land occurs in ozone non-attainment areas



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## Almost all Red Sticker OHMCs are EPA Competition Exempt



Source: U.S. EPA Competition Exemption Database and CARB Certification Database



- U.S. EPA competition exempt OHVs are restricted to use solely for competition
- In California:
  - 90% of Red Sticker OHMCs are primarily used for recreation<sup>1</sup>
  - 74% of Red Sticker owners never race<sup>1</sup>
  - Racing accounts for 6% of total Red Sticker hours operated<sup>1</sup>
- The Red Sticker program allows U.S. EPA competition exempt vehicles to be used recreationally



<sup>1</sup>Source: 2016 OHMC Survey



# Summary of Red Sticker Assessment Findings





# **Additional Red Sticker Assessment Findings**

- Results in unintended impacts on riders and other Agencies
- Red sticker OHVs are the only uncontrolled mobile source category in the State
  - Serves as a loophole to avoid meeting exhaust and evaporative standards
- Emissions standards are outdated or non-existent
  - OHV standard does not include NOx, PM, or CO<sub>2</sub>
  - Global standards are significantly lower (single standard for on-road motorcycles and OHVs)
  - No incentives for zero emission technology



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# Significant Emissions Reductions are Needed

- Over the next 15 years, California needs significant emission reductions to meet critical air quality and climate goals
  - Plan for attaining federal air quality standards outlined in State Implementation Plan (SIP)
- SIP requires an 80% reduction in smog forming emissions from mobile sources in South Coast by 2031
- To meet this target, additional reductions are needed from multiple sources
  - Includes OHV and on-highway motorcycles



# **On-Road Motorcycle Emissions are Increasingly Important**

#### Summertime South Coast ROG + NOx Emissions



## **Proposed Two-Phase Regulatory Process**

# **Phase I: Sunset Red Sticker Program** Establish date to end the Red Sticker program Establish date to end riding restrictions **Phase II: Adopt New Emissions Standards** Tighten emissions standards Incentivize zero emission technologies



# **Proposed Regulatory Timeline**





# **Opportunity to Develop Holistic Standards**





# **Benefits of Recommended Approach**

- Balances need for reductions and stakeholder concerns
- Reduces economic impact of new regulations on stakeholders
  - Maximizes economies of scale
  - Potential to reduce testing and certification costs
  - Minimizes number of redesigns required
- Alleviates riders concerns over trail fragmentation
  - Allows OHVs that meet safety requirements to be registered on-road
- Avoids increase in NOx emissions
- Opportunity to incentivize zero emission technologies



# Problem:

Current racing exemption is ambiguous



#### Solution:

Develop single "competition" definition for all categories

#### Goals:

- Eliminate excess emissions associated with misuse
- Protect exemption for <u>true</u> racing purposes
- Provide clarity on exempted vehicle use



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# **Upcoming Meetings**

- Competition workshop (July 2017)
- On-road motorcycle and OHV emission standard kick-off workshop (Summer 2017)
- Regulatory proposal workshop (October 2017)
- Red Sticker Board hearing (February 2018)



#### **Monitoring and Laboratory Division**

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# **Questions and Comments**

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